

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale and design of this proposal, along with its proximity to the shoreline, give rise to significant concerns regarding its compatibility with statutory requirements and national policy, particularly in relation to sustainable development principles.

A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible effects lack robust supporting evidence.

Policy conflicts are evident and substantive. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy discrepancies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to conclude that the development aligns with policy standards.

The unprecedented scale of the proposal, involving large turbines in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application inadequately addresses the assessment of alternatives, failing to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of presenting a coherent and reasoned comparison of feasible

alternatives based on their environmental impacts, it offers a narrative detailing the project's evolution. This method does not effectively illustrate that less harmful options have been properly identified, evaluated, and preferred over more damaging choices.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative offshore sites, varying development scales, or design configurations.

Notably, the application does not indicate that the developer has adequately considered the potential for turbine placement further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to the shore in determining impact necessitate such analysis; without it, there is no basis for concluding that the proposed siting is the least damaging option.

This inadequacy also extends to the evaluation of cable routing and landfall assessments. The evidence presented does not sufficiently demonstrate that alternative routes have been explored in order to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis imply that mitigation through design has not been implemented, instead relying on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through the selection of the site, layout, and routing of infrastructure. This failure indicates non-compliance with the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a thorough assessment of alternatives, it cannot be determined that the proposal is sustainable or aligns with policy requirements.

From a policy viewpoint, this deficiency undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that contributes to the conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A critical shortcoming is the assessment of otters, a European Protected Species. The application fails to adequately recognise their active use of the coastal regions for

foraging and movement. Without a thorough consideration of their core foraging ranges and behaviours, the potential impacts from construction disturbances, noise, and increased activity are not sufficiently evaluated. This lack of detail undermines any assertions regarding the absence of significant effects on otters.

Additionally, there are substantial gaps in the evaluation of basking sharks, with the assessment relying heavily on aerial surveys that introduce notable detection biases, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show a frequent use of the area by these sharks. The omission of such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate to the required evidential standard that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Key foraging areas and migratory pathways are located within the project area, yet the assessment does not thoroughly evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a contradiction in the application, as the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn

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 accounts for the significance of these feeding grounds, relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional and significant risk, functioning as a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application fails to adequately consider 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 needed to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and prevents a lawful conclusion that would support consent. Furthermore, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the full extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic views, lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines positioned near the shoreline would create an industrial presence that is both continuous and dominant, leading to a permanent and irreversible alteration of this landscape.

The representation of the visual changes resulting from the application is insufficient. Given the scale and close proximity of the turbines, they are set to dominate the views from residential zones, historical landmarks, and popular coastal areas. This intrusion would impact visual amenity directly and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the framework of such a sensitive landscape.

Methodological issues arise concerning the selection and display of visual viewpoints. Evidence indicates that the viewpoints presented may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to crucial cultural heritage sites and landscapes of high value. This raises concerns that the extent of visual impact may have been understated, thereby compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notably, locations such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The magnitude of change is incompatible with the obligation to maintain landscape character, visual amenity, and the context of culturally significant locations. The lack of a thorough worst-case analysis further diminishes any assertion of policy compliance.

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

In summary, the assessment does not accurately reflect the degree of impact, the sensitivity of the environment, or the interconnected relationships between landscape and heritage. These shortcomings preclude a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential consequences for marine species and habitats that have already been recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with relevant policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application in question lacks a robust evaluation of the ecological and socio-economic impacts associated with the proposed development. It fails to demonstrate how these vital uses and habitats will be protected or maintained without significant disruption.

A major concern is the assumption that fishing activities can be displaced without any adverse consequences. The application does not provide evidence indicating that alternative fishing grounds exist, are accessible, or can support the added pressure from displaced fishermen. This is a critical oversight, as the potential for overfishing in

other areas poses risks to the local fishing fleet's economic stability. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces significant risks to marine species, particularly due to the underwater noise produced during construction activities. The anticipated high-energy hammer piling over a prolonged period is expected to cause disturbances across extensive areas, impacting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises considerable concerns, yet the application minimizes the importance of these effects, lacking adequate supporting evidence.

There is a notable inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not establish compliance 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 avoid unacceptable impacts on marine biodiversity, preventing 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 inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly in its consideration of onshore infrastructure impacts. This project, involving offshore turbines and onshore works, is an integrated proposal, yet it has been evaluated separately. This fragmented analysis obscures the true environmental and socio-economic effects.

The onshore aspects encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These operations will require excavation in areas of deep peat, especially within Barvas Moor, which is vital for carbon storage and is an ecologically sensitive habitat. The application fails to provide a thorough evaluation of these impacts,

hindering a clear understanding of the overall environmental footprint of the project.

By not fully assessing the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together. However, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not completely understood.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks and are protected by policy. The application does not show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance associated with the project. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains positive.

Routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, raising doubts about the feasibility and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a whole, along with the failure to demonstrate 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 further weakens the application.

Overall, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly fails to address the assessment of dark skies and nocturnal wildlife, representing a notable omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors.

Given the importance of dark skies to the identity of the region and to emerging tourism sectors such as astro-tourism, this oversight presents a significant gap in the overall landscape and environmental assessment.

Additionally, the absence of an evaluation of impacts on nocturnal wildlife raises further concerns. 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 collision risks. The lack of a lighting impact assessment or a phototaxis study fails to examine how aviation lighting may impact these species and increase mortality rates.

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

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

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

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

TOURISM

The Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark

skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify these concerns.

There are substantial deficiencies in the evidential basis for this application. It lacks complete and reliable baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, key impact pathways, such as those relating to nocturnal wildlife, onshore infrastructure, and tourism effects, have not been addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a complete Social Impact Assessment constitutes a

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

This proposal is also in direct violation of National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, nor does it validate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the proposed net economic benefits. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are concerning and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The evidence required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or utilises the relevant 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 entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6CC0FD15

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Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposed development, which appear incompatible with statutory requirements, national policy, and the principles of sustainable development.

A crucial issue lies in the inadequacy of the evidential basis provided for a lawful determination. Essential environmental data is absent, and the baseline information presented is limited and inconsistent. Moreover, critical aspects of the proposal remain undefined. The flexible design framework utilised obscures the understanding of potentially significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are substantial policy conflicts evident within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, especially with the positioning of large turbines in close proximity to the shoreline. The combination of inadequate information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally inadequate and fails to meet the statutory obligations set forth by the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of

realistic alternatives based on environmental impacts, the application provides a narrative detailing the evolution of the project. This method does not establish that less harmful options have been adequately identified, evaluated, and preferred over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons concerning offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining the extent of impact make the absence of such analysis significant. This void prevents any conclusion that the proposed siting is indeed the least damaging option available.

The issues extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence indicating that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts, combined with the absence of comparative analysis, suggests that mitigation by design has not been adequately applied, resulting instead in a reliance on post-design measures to address potential harm.

Consequently, the application does not demonstrate that environmental harm has been sufficiently minimised through careful site selection, layout, and the routing of infrastructure. This is indicative of a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not undergone adequate evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the West Lewis coastal environment, which is a sensitive and biologically active marine system. The methodologies employed are inadequate for capturing the presence, behaviour, and habitat use of species, resulting in an insufficient evidential basis for evaluating impacts.

Significantly, the application does not adequately recognise or assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The

failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated. This inadequacy compromises any conclusions drawn about the absence of significant effects on this species.

Furthermore, there are notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys creates significant detection bias, particularly under Atlantic conditions. This methodology likely underestimates the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the real scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as 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, necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns related to its impact on seabird populations, particularly given its location within key foraging areas and migratory pathways on the west coast of the Isle of Lewis. This region is known to support internationally important seabird populations, many of which are already in decline. The ornithological assessment accompanying the application is fundamentally flawed, containing notable gaps in evidence and internal inconsistencies that undermine its conclusions. Notably, it fails to demonstrate, to the required evidential standard, that these species will not be adversely affected by the development.

The application exhibits a fundamental contradiction; the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This raises serious concerns regarding the reliability of the assessment, as the conclusions drawn do not align with the underlying evidence. Furthermore, the

assessment lacks sufficient evidence regarding the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not adequately recognised, and the modelling approaches employed introduce uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor significantly heightens the risk of creating a barrier for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate 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 falls short of meeting the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with gaps in data and limitations of the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment 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. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development

remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming 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 obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

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 evaluation of visual and landscape impacts is insufficient and does not adequately capture the extent of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, a lack of development, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a continuous and overpowering industrial presence, significantly altering this character and resulting in a permanent and irreversible change to the landscape.

The application fails to properly convey the magnitude of the visual alteration. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the level of impact or its importance within the context of such a sensitive landscape.

There are significant concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, calling into question the reliability of the assessment.

Another critical shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context linked by visual and spatial connections to the Atlantic

horizon. The assessment treats these as standalone entities instead of recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and disconnecting them from the natural horizon. This signifies not merely a visual impact but a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal stands in direct opposition to National Planning Framework 4, which concerns the protection of natural spaces and historic assets. The extent of change contradicts the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting change is thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment inadequately represents the magnitude of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application relies on mitigation and contingency measures that are to be formulated after consent has been granted, which hinders any meaningful assessment of their potential effectiveness.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to provide adequate details on how these risks will be managed, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty affects potential impacts on marine species and habitats that have already been identified as

sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and compromises the competent authority's capacity to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and if this information is lacking, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, detailed management plans, and uncertainty regarding possible impacts make the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed development raises significant concerns regarding its effects on fisheries and marine life, particularly given the waters off the West Lewis coast, which host a vibrant marine ecosystem and a thriving fishing industry. The application fails to adequately evaluate the ecological and socio-economic impacts, leading to a worrying lack of clarity about how these vital marine uses and habitats will be protected from substantial disruption.

A critical flaw in the proposal is the assumption that fishing activities can be shifted without adverse effects. The absence of evidence regarding the availability of alternative fishing grounds that are accessible and capable of bearing additional pressure is alarming. This gap in the assessment is crucial, as it raises the spectre of overfishing in other locations, which could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based appraisal, the potential ramifications for fisheries and the livelihoods they support remain uncertain.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged duration is likely to disturb marine life over extensive areas, adversely affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is a grave issue that the application appears to minimise, lacking the necessary evidence to support such downplaying.

There is also a troubling inconsistency within the application, where the necessity for

licences to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This contradiction severely undermines the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

Furthermore, there are serious risks to sensitive habitats, including machair systems and peatland areas, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that effective

avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, an essential aspect of environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting will be visible over considerable distances, creating a persistent and intrusive “wall of light” effect on the western horizon, which would drastically transform the night-time environment.

The application fails to assess the implications of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. Given the crucial role dark skies play in the area’s identity and their relevance to emerging sectors such as astro-tourism, this omission is particularly concerning. This gap clearly undermines the overall landscape and environmental assessment.

Moreover, there is no examination of how nocturnal wildlife will be affected. Species including the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The application neglects to include any lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting could influence these species or lead to higher mortality rates.

The shortcomings are exacerbated by the dependency on daytime survey data in the

ornithological assessment, which does not address nocturnal activities or the related risks. Kittiwakes, known to forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leads to a significant gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural areas and environmental quality. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital element of the environment.

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

TOURISM

The application does not adequately assess the impact on tourism, a crucial sector for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative analysis 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, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear if the proposed development would generate a net economic benefit or harm an already established and growing sector.

The assessment neglects to address the significance of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are vital to visitor experience, including emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on a key and expanding part of the local economy.

In an island community with limited economic diversification, failing to evaluate the

impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependencies results in a significant lack of evidence. This hinders a thorough 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 criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

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

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

The proposal contradicts the principles of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to ensure that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit as a result of missing tourism impact modelling.

The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

I have been visiting the isle of Lewis for many years now and have friends who also live on the island. The proposals will be absolutely devastating and have an irreversible impact on every element of life, for both to human and non-human beings, which will negatively impact on tourism. I personally will be less inclined to visit due to proposed changes if passed. There are such great opportunities to get up and close to nature that I have had some of the best in my life, whilst visiting the islands. I anticipate opportunities will be negatively impacted if this proposal was to go ahead. It is atrocious that this monstrosity of a proposal is in anyway being considered. If so much electricity needs to be generated then why are these turbines not being proposed where higher amounts of energy is required due to population density e.g. areas throughout England.

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: E7387434

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The objection is rooted in a review of the Environmental Impact Assessment Report and associated documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and rich cultural identity, as well as its near-pristine environment.

The application lacks sufficient evidence for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined. The use of a flexible design framework obscures an understanding of the likely significant effects, while unspecified mitigation measures hinder any assessment of their potential effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported.

Furthermore, there are notable conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate adherence to national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly impact the statutory tests required for consent and challenge the competent authority's ability to assess the development's acceptability within policy frameworks.

The scale of the proposal is unprecedented for this area, with large turbines situated near the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of inadequate information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable evaluation of the likely environmental impacts associated with the proposal. Central to this inadequacy is the reliance on a flexible Project Design Envelope that lacks definitive specifications

concerning turbine dimensions, layouts, or configurations. This lack of commitment introduces substantial uncertainty and hampers the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not accurately represent the final development, which hinders both public understanding and the competent authority's ability to ascertain the true extent of the environmental effects.

Moreover, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. By seeking consent on the premise that environmental harm will be mitigated at a later date, the application precludes any meaningful evaluation of the effectiveness of such measures or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that potential significant effects and mitigation strategies must be clearly defined prior to determination.

Significant evidential shortcomings further exacerbate the deficiencies in the assessment, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the scale and significance of the impacts, especially where findings 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 and generates scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, which seeks to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations related to biodiversity preservation and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

When considered collectively, the dependence on an unspecified design envelope, the absence of specific mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These failings obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment presents significant shortcomings, failing to deliver a complete or dependable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological

sensitivity and activity, yet the existing baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

A notable gap is the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly examined, undermining any assertions of negligible effects on this species.

In assessing basking sharks, the reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This methodology likely underrepresents the species' presence compared to established land-based observations that indicate frequent usage of these waters. The lack of incorporation of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. Insufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual level of risk to marine species and habitats.

Regulatory compliance is also an issue, as the application does not adhere to the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are lacking. The uncertainty created by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

Moreover, the application contains a fundamental contradiction; it asserts that there will be no significant adverse effects, while simultaneously proposing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by the necessary evidence.

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional risk, effectively creating a barrier in a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and its potential impacts on species with limited global populations have not been adequately assessed.

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

The identified deficiencies also represent non-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 adversely affected places the proposal in direct conflict with national policy.

In conclusion, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise this complexity. It adopts a reductive approach, treating heritage as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming lies in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mistakenly categorised as static features. This mischaracterisation fails to take into account their continued use and meaning, neglecting the impacts of development on their setting. As a result, the evaluation of cultural effects remains incomplete, overlooking their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language and traditions, which are essential to the area's identity. This omission significantly diminishes the understanding of the cultural impact of the development. The Gaelic-speaking population, recognised as an Indigenous People, possesses distinct cultural characteristics, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment, disregarding established principles of participation in decisions affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the recognition of living cultural practices, clearly departs from policy requirements. Consequently, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not provide a sufficient basis for understanding the true cultural cost of the proposal, and the cultural impacts of the development have not been adequately assessed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts reveals significant deficiencies, failing to capture the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon and an undeveloped character that offers a strong sense of remoteness. The proposal for large-scale turbines situated near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and causing permanent and irreversible changes to the landscape.

Moreover, the application does not adequately illustrate the magnitude of the anticipated visual change. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to adequately represent the level of this impact or its

significance in relation to such a sensitive landscape.

Methodological issues further compromise the reliability of the visual assessment, particularly concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, thereby questioning the overall reliability of the assessment.

Additionally, there is a notable shortcoming in recognising the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a larger landscape setting, linked visually and spatially to the Atlantic horizon. The current assessment treats these assets as isolated entities rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape threatens to sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not just a visual impact, but also a broader cultural and spatial detriment that the application has not sufficiently addressed.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The extent of the proposed changes does not align with the need to protect landscape character, visual amenity, and the context of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment severely undermines any assertion of compliance with policy requirements.

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 overwhelmingly dominant and inescapable. Thus, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through any form of mitigation.

Overall, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is inadequate, failing to provide essential details needed to evaluate likely environmental effects. The project entails considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be formulated after consent is granted, which hinders any meaningful assessment of their potential adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application proposes a development that poses substantial risks to marine species, particularly due to underwater noise generated during construction. High-energy hammer piling conducted over an extended period is expected to disturb a wide area, potentially affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming, yet the

application downplays these effects without sufficient evidence to support such claims.

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the assessment of fisheries and marine life is inadequate, failing to provide a comprehensive evaluation of the ecological and socio-economic impacts. A major concern is the assumption that fishing activity can be displaced without any consequences. The application does not offer evidence that alternative fishing grounds are available, accessible, or capable of handling additional pressure. This gap is crucial, as displacement could lead to overfishing in other areas and may have broader economic ramifications for the local fishing fleet.

Moreover, there is a notable inconsistency within the application regarding the need for licences to permit harm to European Protected Species. While this requirement is acknowledged, the impacts are simultaneously described as negligible. This contradiction raises questions about the credibility of the assessment and indicates potential non-compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents significant concerns regarding its assessment and the implications of its onshore infrastructure, which are inadequately addressed in the application. The offshore turbines and onshore works are interconnected, yet the assessment treats them as separate entities. This fragmented analysis obscures the true scale of environmental and socio-economic impacts, failing to recognise the project's full extent.

Critical onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, as well as the

necessary access infrastructure through sensitive landscapes. Notably, this construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders the understanding of the project's overall environmental footprint.

The application also falls short in evaluating cumulative effects due to the exclusion or deferral of onshore impact assessments. The Environmental Impact Assessment process mandates a holistic approach to understanding all project components; however, the separation of offshore and onshore evaluations results in an incomplete picture of the combined effects on peatlands, habitats, and local communities.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks and are subject to policy protection. The application fails to adequately assess potential impacts on these habitats or to outline appropriate avoidance measures, creating a significant evidential gap concerning biodiversity protection.

Furthermore, there are concerns regarding carbon balance, as disturbances to peatland may release stored carbon, thereby potentially creating a carbon debt. This contradicts the goals of renewable energy development, and the application does not sufficiently address this issue or affirm that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land presents additional challenges, introducing conflicts with existing land use and legal rights. The application lacks evidence of the initiation of necessary consents or processes, raising doubts about its deliverability and lawful execution.

From a policy standpoint, the disjointed assessment of the project and the failure to safeguard peatlands, habitats, and land use interests are in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further erodes the credibility of the application.

In summary, the separation of project components, lack of comprehensive impact assessments, and insufficient evidence regarding environmental and land use consequences render this aspect of the application incomplete and unreliable, thereby obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a crucial aspect of the area's environmental quality, cultural identity, and tourism potential. The proposal introduces 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 change would fundamentally alter the night-time environment and represents a significant concern.

Furthermore, the application does not address how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the local identity and to emerging sectors like astro-tourism, this oversight is considerable and creates a notable gap in the overall landscape and environmental assessment.

More importantly, there is no evaluation of the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means the application fails to consider how aviation lighting might affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this vulnerability has not been examined. Without site-specific night-time data, there exists a significant deficiency in understanding the ecological impacts of the proposal.

The absence of an assessment regarding nocturnal impacts prevents the determination of whether protected species or designated sites could face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is in conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts since the night-time character is a vital element of the environment.

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

TOURISM

The proposal lacks a thorough assessment of tourism impacts, failing to consider the significant economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which has escalated from £65 million in 2017 to over £81.5 million, is crucial, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. The application recognises that 86% of visitors are attracted by the region's scenery; however, it does not provide a quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution.

There is a notable oversight in evaluating how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and the resilience of the economy. Without such an analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector. Additionally, the assessment neglects to examine the crucial role that environmental quality plays in tourism, specifically the value of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism.

The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the implications for an increasingly important segment of the local economy. In a community with limited economic diversification, this oversight regarding tourism impacts bears wider consequences for employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, consider environmental influences on visitor behaviour, and acknowledge the island's economic dependence leads to a significant evidential gap. This hinders a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Currently, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

A reliable evidential basis for this application is lacking. It contains critical gaps in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of significant effects or residual impacts.

Additionally, there are evident procedural shortcomings. The lack of a compliant Island

Communities Impact Assessment constitutes a violation of the statutory requirements under the Islands (Scotland) Act 2018. Moreover, the failure to provide the complete Social Impact Assessment represents a significant omission. These shortcomings prevent the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is at odds with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, 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 been insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, which engages the precautionary principle and inhibits 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, the disruption of cultural and visual relationships, and the negative impacts on tourism would result in permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

All of the reasons I've mentioned above. It would be total carnage of a fragile eco structure they have worked hard to get it is now, and don't want to see it 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: C77E26F8

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report fails to provide a complete and reliable account of the likely environmental effects of the proposal. Significant uncertainty arises from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This lack of commitment prevents a consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that is ultimately built, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later inhibits any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates a clear establishment of likely significant effects and mitigation prior to determination.

There are also substantial evidential gaps present, including inadequacies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been fully assessed or that adequate safeguards are in place.

Overall, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of offering a structured comparison of viable options based on environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy viewpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically rich marine system, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture vital details about species presence, behaviour, and habitat usage, leading to an unreliable evidential basis for assessing potential impacts.

One critical oversight involves otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal regions for foraging and movement. Without consideration of their core foraging range and behavioural habits, the potential consequences of construction disturbances, noise, and increased activity remain inadequately assessed. This significant gap undermines the conclusions drawn about the absence of substantial effects on this species.

Additionally, the assessment of basking sharks is marred by its reliance on aerial surveys, which introduce a notable 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 indicate their frequent use of the waters. The neglect to incorporate or properly evaluate such information results in an incomplete baseline, thus diminishing the reliability of the conclusions reached.

The limitations inherent in these methodologies mean that the assertions of negligible or non-significant effects stem from assumptions rather than solid evidence. The lack of adequate baseline data obstructs meaningful evaluations of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements 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 hinders the ability to eliminate adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its potential impact on seabird populations, particularly given the west coast of the Isle of Lewis is home to internationally important seabird species that are already experiencing declines. The ornithological assessment submitted with the application is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The key foraging areas and migratory pathways that the development encroaches upon have not been adequately evaluated for implications related to displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, wherein the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions presented lack adequate support from the available evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces further uncertainty, particularly

concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially due to incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor presents an additional and significant risk by creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term consequences of sustained mortality within this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to provide the evidence necessary to confirm that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means the standard of proving beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to adequately demonstrate that internationally significant 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 contradictions, methodological weaknesses, and inadequate evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the overarching conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is fundamentally lacking, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interweave. Instead, the application employs a simplified approach, treating heritage as isolated, static entities rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the consideration of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites; however, the assessment classifies them as mere static features. This oversight neglects their continued use and significance, as well as the impact that development would have on their setting. Consequently, this misrepresentation leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further overlooks intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the long-established bond between the community and the coastal environment. These elements are vital to the identity of the

region but are conspicuously missing from the evaluation, signifying a major gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement casts doubt on the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. This omission precludes the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities creates a substantial evidential gap. The cultural impacts of the development remain inadequately examined, and the application fails to furnish a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available, resulting in a significant evidential gap. This lack of transparency not only inhibits public understanding but also affects the competent authority's ability to evaluate the full extent of social risks identified in 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 reported impacts stem from direct engagement with the community and are not speculative. However, the inability to access the full assessment hampers proper scrutiny of these findings and restricts an informed decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" recognised in the developer's findings. Despite this acknowledgement, these significant impacts have not been adequately reflected in the main application. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, undermining the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is essential for developments of this magnitude,

particularly when community character and functionality could be affected. The application, in failing to provide comprehensive data, does not present a complete evidential basis for weighing the benefits against potential harm.

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

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

In conclusion, the failure to disclose the full Social Impact Assessment, combined with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This lack of comprehensive information obstructs a lawful determination, further reinforcing the view that the application is inadequately supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines along the West Lewis coastline raises significant concerns regarding its potential impact on the landscape, seascape, and cultural heritage. The assessment is materially deficient, failing to adequately capture the magnitude of visual change and the sensitivity of this uniquely remote environment, characterised by its open Atlantic horizon and undeveloped character. The introduction of industrial turbines in close proximity to the shoreline would create a persistent industrial presence that would fundamentally alter the area's character, leading to a permanent transformation of the landscape.

The visual impact assessment does not sufficiently convey how the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would erode the defining qualities of naturalness and remoteness. This oversight undermines the assessment's reliability, as it does not accurately reflect the true significance of these impacts in such a sensitive landscape. Furthermore, methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence suggests that certain viewpoints may inadequately represent the most sensitive receptors or potential worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes, leading to an understatement of the visual impact.

Moreover, the assessment fails to recognise the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape

setting linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance. The proposed industrialisation of the seascape risks severing these crucial relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon.

From a policy standpoint, this proposal conflicts with National Planning Framework 4, which emphasises the need to protect natural places and historic assets. The scale of change is incompatible with safeguarding the landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines claims of compliance with policy requirements.

Ultimately, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, leading to a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation. Collectively, these deficiencies highlight the inability of the assessment to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate detail for assessing construction and pollution risks, rendering the evaluation of likely environmental effects incomplete. It involves significant 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 future mitigation and contingency measures that will be prepared post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient information on preventative, controlling, or monitoring strategies.

Further complicating matters is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these

concerns. By deferring contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and obstructs the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures be assessed prior to consent; in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Ultimately, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts leads to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a number of significant deficiencies in its assessment of marine life and fisheries, leading to an inadequate understanding of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate the ability to protect or sustain these critical uses and habitats without causing substantial disruption.

A major concern lies in the erroneous assumption that displacing fishing activities will occur without negative repercussions. There is no evidence provided that indicates the availability of alternative fishing grounds that are both accessible and capable of sustaining the additional pressure that may result. This absence is crucial, as displacement could lead to overfishing in other areas and bring about significant economic ramifications for the local fishing fleet. The impacts on fisheries and local livelihoods remain unclear without a thorough and evidence-based assessment.

The proposal also poses considerable risks to marine species, especially due to the underwater noise associated with construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to create disturbances that extend over large distances, potentially impacting species like dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population raises alarming concerns, yet these effects are inadequately addressed in the application, which downplays their significance without adequate supporting evidence.

Furthermore, there is a clear inconsistency in the application where the necessity for licences to permit harm to European Protected Species is acknowledged, while the impacts are concurrently described as negligible. This contradiction undermines the

credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that would legally require authorisation.

The evaluation does not adequately take into account cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough consideration of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, casting doubt on whether this proposal qualifies as sustainable development.

In summary, the lack of evidence regarding the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies in the application contribute to an incomplete and unreliable assessment. These flaws hinder the ability to thoroughly evaluate the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves significant onshore infrastructure linked to offshore turbines, yet the assessment fails to adequately evaluate the full range of impacts as it treats these components separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects that arise from what constitutes a single integrated project.

Integral to the onshore works are the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that passes through sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, is planned despite its significance as a carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

Furthermore, the exclusion or deferral of assessing onshore impacts compromises the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the distinct assessment of offshore and onshore elements fails to account for the combined impacts on peatlands, habitats, and local communities. This separation raises concerns regarding sensitive habitats, including machair systems and peatland environments that are already protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

There are also serious implications for carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the intended benefits of renewable energy development. The application does not sufficiently address this issue nor show that the overall carbon balance remains advantageous.

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

From a policy standpoint, the inadequate assessment of the project as a whole and the failure to protect peatlands, habitats, and land use interests contradict the National Marine Plan and National Planning Framework 4. This inability to demonstrate that impacts can be avoided or mitigated severely undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical shortfall. The West Lewis coastline, known for its exceptionally dark skies, is integral to the area's environmental quality, cultural identity, and tourism value. However, the proposal includes permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to consider the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant given the importance of dark skies to the area's identity and the emerging sectors in tourism, such as astro-tourism. Consequently, there exists a significant gap in the overall landscape and environmental assessment.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate the potential effects of aviation lighting on these species or the potential for increased mortality.

This lack of assessment is aggravated by the dependence on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. Kittiwakes, for example, may forage or migrate at night and could also

be disoriented by artificial lighting; yet this risk has gone unassessed. Without site-specific night-time data, there remains a critical gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, overlooking the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality in fostering tourism, including the necessity of unspoiled landscapes and dark skies for enhancing visitor experiences, as well as the growing markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in the understanding of impacts on a recognised and burgeoning segment of the local economy.

In the context of an island community characterised by limited economic diversification, the failure to evaluate tourism impacts holds broader consequences for

employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed as mandated 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 requirement to show 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.

Ultimately, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism

impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6548B9FF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal lacks a solid evidential foundation for a lawful determination. Essential environmental data is absent, with limited and inconsistent baseline information, and several critical aspects of the proposal remain undefined. The application employs a flexible design framework that hinders a clear understanding of the likely significant effects. Moreover, the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects lack robust evidential support.

The application demonstrates clear policy inconsistencies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient evidence to prove that the national obligations regarding biodiversity, climate interests, and environmental integrity will be met. These inconsistencies challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises substantial concerns, with large turbines sited close to the shoreline, resulting in significant implications for landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents serious deficiencies that compromise its reliability and transparency regarding the environmental effects of the

proposal. The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hampers the application of a worst-case scenario assessment, which is essential for understanding the true environmental impacts. Consequently, both the public and the competent authority are left uninformed about the actual extent of these effects.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet established. This approach seeks consent based on the notion that environmental harm will be mitigated later, thus obstructing any meaningful evaluation of the measures' effectiveness or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental aim of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined before any determination can be made.

Moreover, the report reveals significant evidential shortcomings, with evident gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty regarding the magnitude and significance of the impacts, particularly where claims of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that cannot satisfy statutory requirements.

As a result, the application does not meet the evidential standards required by the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Additionally, the proposal fails to adhere to the requirements set out in National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it cannot substantiate that the impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of clearly specified mitigation measures, and the noted gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These issues preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application inadequately assesses cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. It adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets

rather than acknowledging their active social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment regards them as static elements, neglecting their ongoing significance, use, and the effects of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment fails to take into account intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are crucial to the area's identity but are entirely omitted from the assessment, representing a notable gap. Without considering these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as having characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation in decisions affecting cultural and environmental matters.

There is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority cannot meet its legal obligations to assess the social, cultural, and economic impacts on the island community. Consequently, it prevents a lawful determination of the proposal.

From a policy standpoint, these deficiencies put the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to evaluate both tangible and intangible heritage, along with the neglect of living cultural practices, signifies a clear deviation from policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, leaving the application insufficient for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency regarding social impacts, health, and wellbeing, significantly undermining its evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This absence creates an evidential gap that

hinders both public understanding and the competent authority's ability to grasp the extent of social risks identified in the developer's research.

Residents have reported experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement with the community and are not based on speculation. However, the failure to release the complete assessment restricts proper scrutiny of its findings and limits the determination of their significance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these social impacts have not been fully integrated into the application or given due consideration. The withholding of the full Social Impact Assessment conceals 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 social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functioning could be affected. Without the complete dataset, the application fails to provide a robust evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant; the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw in the application and a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, coupled with documented existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within a high-energy Atlantic environment necessitates substantial seabed preparation and installation works, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead depends on the development of mitigation and contingency measures after consent has been granted, which limits any effective assessment of their potential adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns, particularly in relation to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks associated with sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately detail preventive, control, or monitoring measures.

Moreover, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, assessing the extent, duration, or ecological consequences of these impacts becomes impossible. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the broader context.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and corresponding mitigation must be evaluated before consent is granted, and the absence of this information precludes a lawful determination. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the failure to define mitigation measures, the inadequacy of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a critical failure in the Environmental Impact Assessment. The absence of evaluation for nocturnal impacts makes it impossible to ascertain if protected species or designated sites would suffer adverse effects. Consequently, the evidential standard needed to exclude harmful impacts beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

The West Lewis coastline, known for its exceptionally dark skies, plays a vital role in the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting, which would be visible over vast

distances, creating a continuous "wall of light" that would drastically change the night-time landscape. The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been assessed, despite the significance of dark skies to the region's identity and the burgeoning astro-tourism sector.

Moreover, the lack of evaluation extends to nocturnal wildlife, with species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel being particularly sensitive to artificial lighting. These species are prone to disorientation and increased collision risk due to phototaxis, yet the application fails to include any lighting impact assessment or phototaxis study. The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it fails to capture nocturnal activity or the associated risks. Kittiwakes, for example, may forage or migrate at night and are also susceptible to disorientation from artificial lighting, but this risk remains unaddressed.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which aims to protect natural places and maintain environmental quality. Furthermore, the lack of consideration for the night-time character significantly undermines the overall assessment of landscape and seascape impacts, which are integral to the environment.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a substantial evidential gap, leaving the application incomplete and incapable of justifying a lawful decision. The absence of baseline data, impact modelling, and species-specific analysis further illustrates the inadequacies of the proposal.

TOURISM

The assessment of tourism impacts is significantly inadequate, failing to evaluate 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 heavily reliant on these qualities. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, sustaining more than 1,000 jobs and accounting for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without such analysis, it remains impossible to determine whether the development would yield a net economic benefit or threaten an established and expanding sector.

The assessment also overlooks the crucial role of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies for visitor

experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and growing part of the local economy.

In a community like this island, which suffers from limited economic diversification, the failure to properly assess tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated 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 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 ramifications of the proposal.

Collectively, these failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminate in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when examined against statutory duties, national policy, and evidential standards. This application revisits the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

Critical gaps in baseline data render the evidential basis for determination incomplete and unreliable. The application relies on an undefined design envelope and unspecified mitigation measures, and it fails to address key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of likely 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 outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment represents a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal is in direct conflict with National Planning Framework 4, as it fails to protect 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 lack of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals reveal internal inconsistencies. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

Collectively, these factors indicate that the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, in conjunction with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

This is our island, we are unique, don't ruin what we have for something that is no benefit to our islands.

We appreciate beauty and our island, don't change it for benefits of others

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: E1EE5405

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The deficiencies in the assessment of marine ecology and protected species are significant and compromise the understanding of ecological receptors within the West

Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the baseline data provided is incomplete. The methodologies employed fail to capture essential information regarding species presence, behaviour, and habitat use, which undermines the evidential basis required for assessing potential impacts.

One major concern is the omission regarding otters, a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This oversight extends to the core foraging range and behavioural patterns of otters, which have not been sufficiently evaluated in terms of the potential impacts arising from construction disturbances, noise, and increased human activity. Consequently, any conclusions drawn about the absence of significant effects on this species are fundamentally flawed.

Additionally, the assessment of basking sharks contains considerable deficiencies, particularly due to the reliance on aerial surveys that introduce substantial detection bias, especially in the challenging conditions of the Atlantic. Such an approach is likely to underestimate their presence, particularly in light of established land-based observations that indicate frequent usage of these waters. The failure to incorporate this crucial data further weakens the reliability of the baseline and the overall conclusions presented.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based more on assumptions than on 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, creating uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

foraging areas and migratory pathways, yet the assessment does not adequately address the risks of displacement, collision, or habitat loss.

There is a significant contradiction within the application, as the developer asserts no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only needed when significant harm is anticipated, casting doubt on the credibility of the assessment and suggesting that its conclusions lack proper support from the evidence. Additionally, the assessment fails to demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. It does not fully consider the significance of these feeding grounds, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly where the baseline data is incomplete and the behavioural responses of the species are not fully understood.

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

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

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

Overall, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to community identity and cultural heritage is insufficient. It does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, the application treats heritage as a collection of separate, unchanging assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

There are notable shortcomings in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are handled. These sites serve as active burial grounds and spaces for spiritual practices, yet they are classified as static features. This perspective overlooks their continued use and meaning, as well as the potential impacts of development on their surroundings. Such misrepresentation leads to a flawed evaluation of cultural effects and ignores their essential role in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity but are completely overlooked in the assessment, indicating a significant gap. Without considering these aspects, the cultural ramifications of the development remain unclear.

There are additional issues related to community rights and participation. The Gaelic-speaking population has a distinct cultural identity, with characteristics akin to those of an Indigenous People. However, the application has not undertaken a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the legitimacy of the assessment and does not adhere to established principles for involving communities in decisions affecting their cultural and environmental interests.

A serious procedural error is the failure to provide a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This absence hinders the competent authority's ability to meet its legal obligation to examine the social, cultural, and economic effects on the island community. The lack of this assessment alone renders a lawful decision impossible.

From a policy viewpoint, these shortcomings put the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. Ignoring both tangible and intangible heritage and failing to acknowledge living cultural practices clearly diverges from policy expectations.

In summary, the neglect of living heritage, intangible cultural values, community rights, and legal obligations creates a significant evidential void. The cultural impacts of the proposed development have not been adequately assessed, and the application falls short in providing a reliable basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer's own investigation.

Available summaries reveal that residents are already facing measurable levels of

stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is significantly lacking and does not sufficiently capture the extent of change or the vulnerability of the surrounding environment. The coastline of West Lewis is characterised by an unobstructed Atlantic horizon, an undeveloped landscape, and a profound sense of isolation. The proposed large-scale turbines placed near the shore would impose a relentless and dominant industrial feature, which would fundamentally alter this unique character, leading to a permanent and irreversible change in the landscape.

Furthermore, the application fails to accurately depict the extent of this visual alteration. Given their size and location, the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal spots. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the selection and portrayal of visual viewpoints. Evidence indicates that the viewpoints chosen might not adequately reflect the most sensitive receptors or the most severe scenarios, especially regarding crucial cultural heritage locations and high-value landscapes. This raises concerns that the visual impact may be underrepresented, which compromises the credibility of the assessment.

Moreover, there is a notable deficiency in evaluating the interconnectedness 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 interconnected through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as separate entities rather than acknowledging their interdependence, leading to a partial understanding of the effects on their surroundings and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, modifying the context in which cultural heritage sites are perceived and severing their ties to the natural horizon. This signifies not only a visual impact but also a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historical assets. The magnitude of change is inconsistent with the obligation to preserve landscape character, visual amenity, and the context of culturally important sites. The lack of a comprehensive worst-case analysis further calls into question any assertions of policy adherence.

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

Overall, the assessment fails to provide an accurate representation of the impact's scale, the environment's sensitivity, and the intertwined nature of the landscape and cultural heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, resulting in a failure to provide a solid evaluation of the ecological and socio-economic impacts associated with the proposal. 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 that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A significant concern is the flawed assumption that fishing activities can be relocated without negative consequences. The application lacks evidence to prove that alternative fishing grounds are available, accessible, or capable of withstanding additional pressures. This oversight is critical, as displacing fishing activity poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods reliant on them remain unclear.

Furthermore, the proposal poses notable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended timeframe is likely to disturb a wide range of marine life, notably impacting species such as dolphins. The projected disturbances to a considerable portion of the local bottlenose dolphin population raise urgent concerns; yet, the application minimizes the significance of these effects without presenting sufficient supporting evidence.

The application also reveals a contradiction, as it acknowledges the necessity for licenses to allow harm to European Protected Species, while simultaneously downplaying the anticipated impacts as negligible. This inconsistency undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially in cases where harm is expected to a level that necessitates legal permission.

Moreover, the assessment neglects to consider cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. In the absence of a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism value of the area. However, the Environmental Impact Assessment lacks any evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The proposal incorporates permanent red aviation lighting that is visible over extensive distances, resulting in a disruptive "wall of light" effect across the western horizon that would significantly alter the night-time environment.

There has been no assessment of how this lighting would affect 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 growing tourism sector focused on astro-tourism. The absence of consideration for these factors leads to a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a lack of analysis regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and heightened collision risks. The application does not present any lighting impact assessment or phototaxis study, failing to investigate how aviation lighting may influence these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting. However, this risk has not been evaluated. The lack of site-specific night-time data creates a significant void in understanding the ecological impacts.

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

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

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

TOURISM

The evaluation of tourism impacts within the application is fundamentally lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contributions of this sector.

The tourism industry has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs while accounting for up to 16% of the island's economy. However, the application does not model how the anticipated industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the resilience of the broader economy. Without such crucial analysis, it remains uncertain whether this development would yield a net economic benefit or jeopardise a flourishing sector.

Moreover, the assessment neglects to recognise the significance of environmental quality in promoting tourism. The importance of unspoiled landscapes and dark skies to the visitor experience, particularly concerning emerging sectors like nature-based tourism and astro-tourism, is left unexamined. The lack of a Dark Skies Assessment intensifies this shortcoming, resulting in a significant gap in understanding the potential impacts on this recognised and expanding segment of the local economy.

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

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity of showcasing net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks the necessary evidence to enable the competent authority to assess the economic repercussions of the proposal effectively.

When considered collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This gap hampers a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal raises significant concerns that cannot be overlooked. It fundamentally fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the issues that led to the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a key factor. Presently, it is submitted within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential foundation upon which the application stands. There are inadequacies in the baseline data, and the design envelope remains undefined. Furthermore, the proposed reliance on unspecified mitigation measures and the omission of key impact pathways—including those affecting nocturnal wildlife, onshore infrastructure, and tourism—render the Environmental Impact Assessment incomplete. As a result, it hinders a comprehensive understanding of significant effects or residual impacts.

The proposal also faces procedural shortcomings, particularly the absence of a compliant Island Communities Impact Assessment, which contravenes the statutory duty established by the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a substantial omission. These deficiencies obstruct the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately deeming the application unsuitable for determination.

Contradicting the National Planning Framework 4, the proposal does not adequately safeguard biodiversity, natural places, or cultural heritage. It fails to demonstrate that impacts on health and wellbeing are acceptable, nor can it evidence a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been sufficiently conducted, concealing effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle and prevents a lawful determination of acceptable impacts.

Moreover, the proposal would induce profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruption of cultural and visual relationships, along with the adverse effects on tourism, represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination, both procedurally and substantively. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs the possibility of a lawful,

evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the appropriate regulatory measures to mandate the provision of the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 7056A25F

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 regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies across various aspects including planning, environmental, cultural, and procedural matters. The project is situated off the west side of the Isle of Lewis, a region known for its rugged, Atlantic-facing coastline, largely untouched natural environment, and strong cultural heritage. Concerns are raised regarding the scale, design, and proximity of the wind farm, which may not align with statutory requirements, national policy, or the principles of sustainable development.

A critical examination reveals that the application lacks a sufficient evidential basis to allow for a lawful determination. Essential environmental data is absent, the baseline information provided is inconsistent and limited, and many key elements of the proposal remain undefined. The flexible design framework employed obscures potential significant effects, while the unspecified mitigation measures render any evaluation of their effectiveness impossible. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsubstantiated by strong evidence.

There are evident policy conflicts that cannot be overlooked. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding issues of biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and weaken the competent authority's ability to determine the project's acceptability according to policy standards.

The scale of this development is unprecedented for this area, with large turbines being proposed in close proximity to the shoreline, raising substantial concerns over landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, weaknesses in evidence, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Given these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is critically insufficient and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of viable alternatives based on their environmental effects, the application offers a narrative account of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a clear lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the importance of such an analysis; without it, one cannot conclude that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This oversight includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, alongside the absence of comparative analysis, suggests that mitigation by design has not been utilised, with an over-reliance on post-design measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and prevents the competent authority from understanding whether less harmful and more suitable alternatives are available. Without a rigorous assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty introduced by this lack of thorough evaluation prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding the reliability of the ornithological assessment, which is riddled with substantial gaps in evidence and internal contradictions that fundamentally undermine its conclusions. The site is situated on the west coast of the Isle of Lewis, an area known to support internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate, to the requisite evidential standard, that these species will remain unaffected. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to thoroughly evaluate the implications of habitat loss, collision risk, and displacement.

Moreover, a critical inconsistency is evident in the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, suggesting that its conclusions are not substantiated by the evidence provided. The assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The importance of

these feeding grounds is not fully acknowledged, and reliance on modelling methods 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 incomplete and the behavioural responses of the birds remain poorly understood.

Placing turbines within a recognised migratory corridor adds another layer of significant risk, potentially creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of ongoing mortality in this corridor, along with the potential impact on species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, impeding any lawful conclusions that could support consent.

The identified deficiencies also demonstrate a lack of compliance with National Planning Framework 4, particularly concerning biodiversity protection and the conservation of natural assets. The inability to convincingly show that internationally significant seabird populations will not be adversely affected positions the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These issues hinder a thorough evaluation of potential impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for a favourable decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the

community and the coastal environment. These elements are vital to the area's identity yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming 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 obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment, which included focus groups with local residents, has not been fully published, creating a significant evidential gap. This lack of transparency is a serious concern as it limits both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Residents are already reporting measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, the findings cannot be properly scrutinised, which hinders the decision-making process regarding their significance.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Unfortunately, these social impacts have not been adequately reflected in the main application or given the weight they deserve. The failure to disclose the complete Social Impact Assessment obscures

the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process, as a full understanding of social, economic, and health impacts is crucial for developments of this scale. The community character and functioning may be at risk, and without the full dataset, the application does not present a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should support positive health outcomes and avoid harm, yet the evidence indicates existing adverse effects that remain undisclosed. Thus, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission within the application that fails to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, combined with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This lack of information prevents a lawful determination and reinforces the conclusion that the application is not supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The addition of large-scale turbines situated near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the assessment does not sufficiently convey the extent of this visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and commonly visited coastal locations. Consequently, this would have a direct negative effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation fails to adequately express this level of impact or its significance within the context of such a sensitive landscape.

Concerns regarding methodology arise from the selection and presentation of visual viewpoints. Evidence indicates that certain viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been understated, thereby compromising the reliability of the

assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the experience of heritage assets and severing their connection to the natural horizon. This represents not only a visual impact but also a wider cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The degree of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

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

CONSTRUCTION AND POLLUTION RISKS

The 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 are home to a diverse marine ecosystem and support an active fishing industry. However, the application lacks a thorough evaluation of ecological and socio-economic impacts, raising significant concerns about the potential disruption to these vital resources. A critical issue lies in the assumption that fishing activity can be displaced without consequence, yet there is no evidence provided that alternative fishing grounds are available or capable of supporting the additional pressure this displacement would create. This omission is alarming, as it risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a detailed assessment grounded in evidence, the implications for fisheries and local livelihoods remain obscure.

Additionally, the proposal poses considerable risks to marine species, notably due to underwater noise generated during construction. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across vast distances, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises profound concerns; yet, the application tends to diminish the importance of these effects without adequate supporting evidence.

There exists a troubling inconsistency within the application. While it acknowledges the

necessity of licences to permit harm to European Protected Species, it simultaneously characterises the impacts as negligible. This contradiction undermines the credibility of the assessment and prompts concerns regarding adherence to the Habitats Regulations, especially where anticipated harm would necessitate legal authorisation.

Furthermore, the assessment fails to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an in-depth evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

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

In summary, the inadequacy of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These shortcomings hinder any robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and fails to encompass the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of the environmental and socio-economic consequences.

The onshore components involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes. These operations necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

Moreover, by deferring or omitting the assessment of onshore impacts, the application obstructs an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be reviewed collectively; however, the distinct assessment of offshore and onshore components fails to capture the combined effects on peatlands, habitats, and communities.

There are also grave risks posed to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not adequately illustrate that the impacts on these habitats have been thoroughly

evaluated or that suitable avoidance measures have been implemented, leaving a significant evidential gap concerning biodiversity protection.

The proposal additionally raises issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy initiatives. This application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or procedures have been initiated, leading to uncertainty regarding deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

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

TOURISM

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

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment neglects to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the wider economic resilience. Without this analysis, it remains unclear if the proposed development would provide a net economic benefit or detract from a sector that is already established and flourishing.

Additionally, the application does not adequately consider the role of environmental quality in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. This is especially important for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the potential

impacts on a recognised and expanding sector of the local economy.

In an island community that has limited economic diversification, the inadequate assessment of tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

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

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits serious deficiencies that compromise its compliance with sustainable development criteria as mandated by statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 are apparent, as the current application presents a level of industrialisation that remains unacceptable despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for a sound determination of the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural

heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude 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 would result in permanent changes that cannot be mitigated to an acceptable level.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E8F73C30

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an examination of the Environmental Impact Assessment Report and associated documentation, highlighting 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 noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for lawful determination. It suffers from significant omissions in critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures precludes an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly pertinent concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability within policy frameworks.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the assessment's integrity, making it difficult for both the public and the competent authority to grasp the true extent of environmental impacts.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being requested with the expectation that environmental harm will be managed at a later stage. This approach hinders a meaningful evaluation of the measures' effectiveness and the 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 framework, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and the use of assumptions rather than site-specific evidence. These issues create uncertainty regarding the magnitude and significance of impacts, especially where conclusions 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, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the dependence 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 hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on environmental effects, it presents a narrative detailing the evolution of the project. This

method fails to prove that less damaging options have been thoroughly identified, assessed, and chosen over more harmful solutions.

There is no clear comparison of alternative offshore locations, development scales, or design configurations supported by evidence. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, where the visual, ecological, and coastal impacts are likely to be lessened. The sensitivity of the West Lewis coastline and the crucial role of proximity to the shore in determining impact highlight the significance of this missing analysis, which obstructs any conclusion that the proposed siting is indeed the least damaging option.

The inadequacies also extend to the cable routing and landfall assessment, where there is a lack of evidence to suggest that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been incorporated, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This signifies a failure to adhere to the established mitigation hierarchy, which is essential for the competent authority to ascertain whether there are less harmful and more appropriate alternatives available. The absence of a thorough alternatives assessment undermines the conclusion that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming jeopardises adherence to National Planning Framework 4, especially in terms of safeguarding natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, contributing to the overall finding that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies applied are insufficient, as they do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or assess their active usage of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential effects of

construction disturbance, noise, and increased activity. This oversight undermines any conclusions suggesting an absence of significant effects on this species.

Further weaknesses are evident in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

The methodological limitations outlined mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty about the true scale of risk posed to marine species and habitats.

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

In summary, the deficiencies related to incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These issues impede a robust evaluation of the impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is deeply flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. Notably, the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the development, yet the assessment does not adequately evaluate the potential implications of displacement, collision risk, or habitat loss.

There is a crucial contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by sufficient evidence.

Moreover, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given that baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively posing a barrier to a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or consider the potential impacts on species with relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are closely interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It reduces heritage to isolated, static assets and overlooks their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites like the cemeteries at Dalmore, Bragar, and Barvas are treated merely as static features. These places are not only active sites of burial but also important for spiritual practices. By failing to consider their continued use and the impact of development on their surroundings, the assessment provides an incomplete evaluation of cultural effects and ignores their significance in community life.

The assessment also neglects intangible cultural heritage, such as the Gaelic language,

traditions, and the deep relationship between the community and the coastal environment. These factors are crucial to the area's identity but are not addressed at all, leading to a significant omission. Without recognising these elements, it is impossible to fully understand the cultural impact of the development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and does not adhere to 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, which is a legal requirement under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to assess the social, cultural, and economic impacts on the island community, preventing lawful determination.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, along with the disregard for living cultural practices, marks a clear deviation from policy expectations.

In summary, the failure to properly assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not provide a solid foundation for understanding the true cultural cost 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 the proposal's impact on seascape, landscape, and visual aspects is insufficient and fails to adequately capture the extent of the changes and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that conveys a strong sense of remoteness. The addition of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent transformation of the landscape.

The proposed turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would significantly affect visual amenity and detract from the naturalness and remoteness of the environment. The assessment does not effectively communicate the magnitude of this impact or its importance in the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints, as the evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the assessment has understated the visual impact, calling into question its reliability.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been adequately considered. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are interconnected within the broader landscape,

linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, which results in an incomplete understanding of the impact on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these interrelationships, altering how heritage assets are perceived and their connection to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural areas and historic assets. The scale of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further questions any claims of compliance with policy.

Moreover, the identified impacts are unlikely to be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be prominent and unavoidable. Consequently, the change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. It proposes extensive 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. 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.

This reliance on unspecified future measures is concerning due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the methods for preventing, controlling, or monitoring these risks.

There is also ambiguity surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty applies to potential effects on

marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning to after consent, the application hampers the ability to evaluate whether suitable safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and when such information is absent, a lawful determination cannot be reached. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty about potential impacts render the assessment materially 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 proposal presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these essential uses and habitats can be preserved or sustained without substantial disruption.

A critical concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence that alternative fishing grounds are both available and capable of accommodating the additional pressure that would result from displacement. This oversight is important, as such displacement could lead to overfishing in other areas, potentially affecting the local fleet's economic viability. Without a solid, evidence-based 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 that would be generated during construction activities. The use of high-energy hammer piling for prolonged periods is expected to create disturbances over considerable distances, impacting species such as dolphins. The anticipated effects on a significant portion of the local bottlenose dolphin population are concerning, yet the application minimizes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency within the application, where the need for licences to allow harm to European Protected Species is acknowledged, while the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly in cases where anticipated harm requires legal authorisation.

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

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

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic impacts, and internal contradictions renders the assessment incomplete and untrustworthy. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure undermines the understanding of the full extent of impacts associated with this integrated project. Although the offshore turbines and onshore works are intrinsically linked, they have been evaluated separately, which obscures the true scale of the environmental and socio-economic consequences. The lack of a comprehensive assessment means that the cumulative effects on sensitive habitats, peatlands, and local communities remain unclear.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application has not adequately addressed the impacts of these works, preventing a full understanding of the project's overall environmental footprint.

Moreover, there are serious risks to critical habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate measures to avoid harm have been implemented. This results in a significant evidential gap concerning biodiversity protection.

The proposal also raises vital concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts renewable energy objectives. The application does not sufficiently tackle this issue or illustrate

that the overall carbon balance remains beneficial.

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

From a policy standpoint, the failure to consider the project as a whole, 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 mitigated or avoided significantly weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect along the western horizon. This change would significantly alter the night-time environment, yet the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the crucial role of dark skies in the local identity and the emerging tourism sectors, such as astro-tourism, this omission represents a significant gap in the overall landscape and environmental assessment.

Furthermore, there has been no consideration of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting might affect these species or lead to increased mortality.

The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this vulnerability has also gone unassessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential

standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy perspective, the omissions present in the application contradict National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. This lack of consideration also undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

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

TOURISM

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

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

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

Collectively, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic reliance leads to a

significant evidential gap. This hampers a robust evaluation of the economic effects, ultimately suggesting that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a failure to meet the standards of sustainable development. This proposal does not address the statutory duties, national policy, or evidential standards required. It echoes the issues from the 2008 refusal of the Lewis Wind Power proposal, as the industrial scale remains unacceptable. Although the current application falls under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still lacks necessary support.

Significant gaps in baseline data are evident, alongside the use of an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways are omitted. This includes nocturnal wildlife, full 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.

Procedural failures are present as well. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal conflicts with National Planning Framework 4. It does not sufficiently protect biodiversity, natural places, or cultural heritage. There is a lack of evidence showing that health and wellbeing impacts are acceptable, and it fails to demonstrate a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts from offshore and onshore components have not been accurately assessed, leaving the effects on peatlands, carbon balance, habitats, and crofting land unclear.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to rule out adverse effects has not been achieved, invoking the precautionary principle and hindering lawful conclusions regarding acceptable impacts.

The proposal will 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 effects on tourism represent permanent changes that cannot be mitigated adequately.

Considering these issues, the application is procedurally and substantively unfit for

determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or exercise regulatory provisions to demand the missing information.

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

Additional Comments

Scotland Needs to be protected alongside our natural habitats, animals, sealife, scenery. Wildlife will die, be endangered and Scotland should not be exploited any more. We have enough destruction and windfarms already and our bills are still extortionate .. let alone sharing our power with England but im the process destroying Scotland. We have had enough!!!

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: FE18613A

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 is incomplete and lacks a clear account of the potential environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates uncertainty and hinders a consistent worst-case scenario analysis. This compromises the assessment's integrity and means that the impacts reported may not accurately represent the actual development, leaving both the public and the relevant authorities unable to understand the true environmental implications.

The application depends on mitigation measures, management plans, and monitoring strategies that have yet to be defined. Therefore, consent is being sought with the understanding that any environmental harm will be addressed later, making it impossible to properly evaluate the effectiveness of these measures or assess residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the aims of the Environmental Impact Assessment framework, which demands that likely significant effects and mitigation strategies be clearly outlined before any decision is made.

There are also critical gaps in evidence, including a lack of baseline data and methodological limitations, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions indicate negligible effects without solid supporting data. The insufficient information hampers a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not meet the evidential standard required under the Habitats Regulations to prove the absence of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, particularly the requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that adequate 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 make the Environmental Impact Assessment Report unreliable and inadequate. These shortcomings prevent a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the requirements set out by the Environmental Impact Assessment regime. It does not provide a clear comparison of realistic alternatives based on their environmental effects. Instead, the application offers a narrative of project development, which does not effectively show that less harmful options have been identified, assessed, and chosen over more damaging solutions.

There is no clear, evidence-based analysis of alternative offshore locations, development scales, or design options. Specifically, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be reduced. The West Lewis coastline is particularly sensitive, and proximity to shore is crucial in assessing impacts. Thus, the lack of this analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

The shortcomings also apply to cable routing and landfall evaluation. There is inadequate evidence that alternative routes have been thoroughly examined to prevent or lessen impacts on sensitive receptors, including culturally significant sites like Barvas Cemetery. The absence of a clear strategy to avoid these impacts, along with a lack of comparative analysis, suggests that mitigation through design has not been implemented, relying instead on mitigation measures after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight constitutes a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine if less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of assessment compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative analysis is a significant omission, leading to the conclusion that the application has not been properly evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant oversight is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are inadequately evaluated. This gap undermines any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals further deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially in comparison to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and further weakens the reliability of the conclusions presented.

These methodological limitations mean that any conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data impedes a meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions, creating uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory perspective, the application does not meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these conditions, 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 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 reveals significant flaws, undermining its credibility. There are substantial gaps in the evidence and internal inconsistencies that raise serious questions about its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already declining. However, the application does not provide the necessary evidence to demonstrate that these species will not be adversely affected. The development site is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also putting forth a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not adequately recognised, and the reliance on modelling methods introduces further uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and

behavioural responses are not fully considered.

The proposed siting of turbines within a recognised migratory corridor presents an additional and serious risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory concerns emerge as the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

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

In summary, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial details needed to assess the risks associated with construction and pollution. It includes substantial seabed preparation and installation in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be created after consent, which hinders any meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises concerns about the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient information on prevention, control, or monitoring strategies.

There is significant uncertainty regarding the size and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts. This uncertainty also extends to effects on marine species and habitats that have been identified as sensitive in the broader

assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application restricts the evaluation of whether adequate safeguards are available to manage pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and the absence of this information means that a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity on potential impacts render the assessment materially inadequate. These issues prevent a comprehensive evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the socio-economic and ecological impacts on fisheries and marine life. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal fails to adequately demonstrate that these vital habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be relocated without repercussions. The application does not provide sufficient evidence that alternative fishing grounds exist, are accessible, or can sustain the additional fishing pressure. This significant oversight risks contributing to overfishing in other areas and could have broader economic ramifications for the local fishing fleet. The lack of a thorough and evidence-based assessment means that the impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over substantial distances, affecting species such as dolphins. The projected disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these potential effects without adequate supporting evidence.

There exists an evident inconsistency within the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while

simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when potential harm necessitates legal authorisation.

Additionally, the assessment overlooks the 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 the socio-economic landscape.

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

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

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 assessment of the potential impacts on tourism is severely lacking, overlooking crucial economic and social implications for a vital sector of the Isle of Lewis economy. The economy here relies heavily on tourism, which thrives on the area's wild coastline, almost untouched landscapes, dark skies, and overall sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the application fails to provide a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, escalating from £65 million in 2017 to more than £81.5 million, thereby supporting over 1,000 jobs and making up to 16% of the island's economy. Nonetheless, the application neglects to explore how the anticipated industrialisation of the seascape and subsequent decline in environmental quality could affect Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector.

Furthermore, the assessment inadequately addresses the significance of environmental quality in nurturing tourism, particularly highlighting how unspoiled landscapes and dark skies enhance visitor experiences and promote emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversification,

the failure to properly evaluate tourism impacts raises broader concerns for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been duly assessed, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impacts and the necessity of illustrating net benefits. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This omission hampers a thorough evaluation of economic effects, supporting the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm illustrates significant shortcomings in meeting the standards required for sustainable development, failing to comply with statutory obligations and national policy. The proposal is reminiscent of the previously rejected Lewis Wind Power initiative from 2008, which was deemed excessively industrialised. Despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address the essential issues identified in the past.

A reliable evidential basis for decision-making is notably absent, with critical gaps in baseline data and an undefined design envelope. The application depends on unspecified mitigation measures, and it neglects to consider key impact pathways such as those affecting nocturnal wildlife, the entirety of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, hampering a full understanding of the likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies. Notably, it lacks a compliant Island Communities Impact Assessment, violating the Islands (Scotland) Act 2018, and does not disclose a complete Social Impact Assessment, which is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal falls short. It fails to safeguard biodiversity, natural landscapes, and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit, especially in terms of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore components has not been thoroughly evaluated,

leaving uncertainties regarding their effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

This proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline would result in the loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, yielding permanent changes that cannot be mitigated effectively.

When considering all these factors, the application emerges as procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent for this application or invoke the necessary regulatory provisions to require the submission of the missing information.

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

Additional Comments

I personally object to a windfarm being built, whereby the energy generated will power data centres near Glasgow. Also the islanders have fuel poverty. The windfarm will not address this factor.

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: EC155E58

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 stems from an analysis of the Environmental Impact Assessment Report and associated documents, which reveal significant deficiencies in planning, environmental considerations, cultural respect, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the project, specifically questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. There are notable gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of the likely significant effects, while the unspecified mitigation measures make it impossible to assess their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by adequate evidence.

Furthermore, there are pronounced policy conflicts associated with the proposal. 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 application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal in this area raises serious concerns about landscape capacity, visual dominance, and environmental impact, given the large turbines planned to be positioned close to the shoreline. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential deficiencies, and clear non-compliance with policy illustrates that the application is incomplete and cannot facilitate a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report exhibits significant shortcomings and fails to deliver a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty inhibits the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be realised, hindering both public understanding and the competent authority's capacity to comprehend the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. The request for consent is predicated on the assumption that environmental harm will be mitigated at a later date, which undermines the ability to thoroughly evaluate the effectiveness of such measures or assess any residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined prior to any determination.

Moreover, there are notable deficiencies in the evidential basis, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential requirements set forth by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially in regard to protected species and sensitive habitats. The proposal also falls short of demonstrating compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully evaluated or if appropriate safeguards have been established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly lacking, providing an incomplete and unreliable picture of the ecological receptors in the West Lewis coastal environment. This region is a sensitive and biologically rich marine system, yet the baseline data presented is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the evaluation fails to establish a robust evidential basis for assessing potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application neglects to properly identify and assess their active usage of coastal areas for foraging and movement. The assessment overlooks their core foraging range and behavioural patterns, leading to an insufficient evaluation of the potential impacts of construction disturbance, noise, and increased activity. This lapse undermines any findings regarding the absence of significant effects on this species.

Further, the assessment of basking sharks suffers from substantial deficiencies due to its reliance on aerial surveys, which introduce a considerable 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 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 more on assumptions than on sound evidence. The lack of sufficient baseline data also hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding 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 and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, granting consent cannot be justified legally.

Overall, the combination of inadequate 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 reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is significantly flawed, exhibiting notable gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast

of the Isle of Lewis is home to seabird populations of international importance, many of which are already declining. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated in the development's location, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises in the application, as the developer asserts that no significant adverse effects will occur while simultaneously advancing a case for derogation under the Habitats Regulations. Such a case is only warranted when significant harm is anticipated, thus questioning the reliability of the assessment and suggesting that its conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully accounted for, and the reliance on modelling methods introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, potentially creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of sustained mortality within this corridor or the possible 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 conflicting 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 could support consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and inadequate evidence. These shortcomings hinder a robust 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 evaluation of community identity and cultural heritage surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the

connections between environment, tradition, language, and community are deeply intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings are 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 the assessment describes them as static features, overlooking their ongoing significance and the effects of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their relevance to community life.

Moreover, the assessment fails to account for intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the assessment, which represents a major shortfall. Without addressing these aspects, the real cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as an Indigenous People, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's legitimacy and does not adhere to established participation principles regarding decisions that affect cultural and environmental interests.

A fundamental procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these gaps contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of disclosure regarding the full Social Impact Assessment is a material deficiency that fundamentally undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged

in a Social Impact Assessment and conducted focus groups with local residents, the comprehensive report has not been made public. This gap in evidence obstructs both public insight and the ability of the competent authority to comprehend the full extent of social risks highlighted by the developer's own findings.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes presented in the application is fundamentally inadequate. It does not truly capture the scale of transformation nor

the sensitivity of the environment affected. The West Lewis coastline, characterised by its expansive Atlantic horizon and an unspoiled, remote character, would face significant alterations with the introduction of large-scale turbines near the shoreline. This would establish a constant industrial presence, leading to an irreversible and profound change in the landscape.

Moreover, the visual consequences of this proposal have not been accurately portrayed. The turbines, due to their size and closeness to residential areas, historic sites, and popular coastal regions, would dominate views, severely impacting visual amenity and diminishing the area's essential qualities of naturalness and remoteness. The assessment falls short of adequately expressing the significance of this impact in light of the area's sensitivity.

Concerns also arise regarding the methods employed in selecting and displaying visual viewpoints. Evidence indicates that these viewpoints may not represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This situation raises the possibility that the visual impact has been downplayed, thereby undermining the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the intertwined relationship between landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the wider landscape through visual and spatial connections to the Atlantic horizon. The assessment incorrectly treats these sites as isolated entities rather than acknowledging their interrelatedness, resulting in an incomplete understanding of how impacts affect their setting and cultural significance.

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

From a policy standpoint, this proposal stands in direct conflict with the National Planning Framework 4, which seeks to protect both natural environments and historic assets. The magnitude of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment diminishes any assertion of compliance with relevant policy.

It is also evident that the identified impacts cannot be adequately mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelming and inescapable. Consequently, the change introduced by this development is both fundamental and permanent, rather than something that could be lessened to an acceptable degree through mitigation measures.

Overall, the assessment fails to convey the true scale of the impact, the environmental

sensitivity, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is fundamentally inadequate and lacks the necessary detail to appraise the likely environmental effects. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on unspecified mitigation and contingency measures to be formulated after consent, which precludes any thorough evaluation of their sufficiency or effectiveness.

This reliance on vague future actions raises serious concerns due to the sensitivity of the surrounding 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 acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it does not offer adequate details on how these risks will be mitigated, controlled, or monitored.

Furthermore, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and clearly delineated management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies 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 only exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether sufficient safeguards are in place to address pollution incidents. This situation introduces procedural risks and impairs the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of such information means a lawful determination cannot be achieved. Moreover, the application does not adequately demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts make the assessment materially deficient. These flaws obstruct a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal under consideration raises significant concerns regarding the potential impact on local 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 does not sufficiently demonstrate that these vital habitats and uses can be preserved without considerable disruption.

One major concern lies in the assumption that fishing activities can be displaced without any negative effects. The application lacks evidence indicating the availability or accessibility of alternative fishing grounds that could adequately support the additional pressure. This is an important omission, as the risk of overfishing in other areas could have serious economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hampers the understanding of the impacts on both fisheries and local livelihoods.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise created during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across significant distances, including species like dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these impacts without adequate supporting evidence.

Moreover, the application contains a notable inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal authorisation.

The assessment also fails to adequately consider the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall implications for marine ecosystems and socio-economic conditions remain undetermined.

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 proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, undermining any claims of sustainable development.

In summary, the significant deficiencies in the assessment—including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions—render it incomplete and unreliable. These issues prevent a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to recognise the interconnected nature of the offshore turbines and the onshore works. These components are assessed independently, leading to a fragmented evaluation that conceals the true extent of environmental and socio-economic consequences.

The onshore project includes the construction of a substation near Stornoway, cabling across protected moorland, and additional access infrastructure through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts means that the overall environmental footprint of the project remains unclear.

By neglecting the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the distinction between offshore and onshore elements prevents a full understanding of the combined effects on peatlands, habitats, and local communities.

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

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application falls short in addressing this issue and fails to establish that the overall carbon balance remains favourable.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a serious oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly troubling given the significance of dark skies to the area's identity and to emerging tourism sectors, including astro-tourism. Such omissions result in a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or phototaxis studies, failing to address how the proposed aviation lighting might affect 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 activities and associated risks. For example, Kittiwakes may forage or migrate at night and are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

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

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

TOURISM

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

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment neglects to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the wider economic resilience. Without this analysis, it remains unclear if the proposed development would provide a net economic benefit or detract from a sector that is already established and flourishing.

Additionally, the application does not adequately consider the role of environmental quality in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. This is especially important for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in understanding the potential impacts on a recognised and expanding sector of the local economy.

In an island community that has limited economic diversification, the inadequate assessment of tourism impacts has broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

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

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that caused the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable in terms of the scale of industrialisation. This current application is presented under a

policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

The application lacks a complete and reliable evidential basis for decision-making. There are significant gaps in baseline data, it utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it fails to address key impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. As a result, the Environmental Impact Assessment is incomplete, inhibiting a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, not disclosing the full Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain unclear and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, preventing a lawful conclusion that the impacts are acceptable.

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

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

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

Additional Comments

Your Environmental assessment is so blind one sided and just a tick box exercise it is unbelievable. You have NO regard for anything environmental at all. Too even consider this area for turbines is ridiculous. If you get your chance to build your disgusting cancer ridden chemical leeching heaps they will make damn sure we will never see a fish in any coastal river on Lewis again. If we even did get one it will be that polluted from the chemical run off your turbines it would be inedible and in most likely very poor health. We have been forced to have the sea eagle re introduced on us which is decimating our lambs when they are young. You will be responsible for decimating the sea eagle and many many other species if you get your way. The noise vibrations coming off these monstrosities will make sure you carve up our wonderful birds. Your nasty turbines will do absolutely NOTHING for the local communities your idea of "funding" and back handing our local council is a mere crumb off your fat corporate table. You will Decimate the communities. Even the English won't want to move here any more. You are threatening a way of life you cretins! The glare from the sun in your turbines will be severe for people with epilepsy and other light sensitive conditions. You'll always fail to mention this due to the size of your turbines and where the sun sets. The once beautiful west coast will look like a scene from 1984 with your utopia of turbines. Destruction depopulation and carnage will ensue. You will PROVIDE nothing in regards to work for the locals! Who are you getting to put the turbines up.... Russians, Lithuanians Koreans??? Where are you buying them from the good old Republic of China. Your propaganda is nothing short of a scam!!!! You will give this island nothing and take everything!!!! I would hate to see how much chemicals fuels etc you will spill into the sea if you get to construct. The weather will be such a big problem for you at least I can laugh looking at your idiots from my living room while they flounder in the mighty Atlantic! What is the exclusion zone around your monstrosities? Not mentioning that. West coast fishing will be destroyed due to you and your GREED!!!!!! Your onshore infrastructure alone is shameful! Digging through all that peat for cables! Hope you have had a radiation assessment done for Cesium 137! The moorlands are riddled with it after 1986! Another thing you will try sweep under the carpet!

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: A223B721

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is sited off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoilt environment, and rich cultural heritage. The size, proximity, and design of the proposed wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There are gaps in critical environmental data, and baseline information is both limited and inconsistent. Furthermore, vital components of the proposal remain unclear. The flexible design framework used obscures the understanding of potential significant effects, while the proposed mitigation measures, which have yet to be clearly defined, render an assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims regarding negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are apparent and substantial. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not show that it can meet national obligations to protect biodiversity, climate interests, and environmental integrity. Such discrepancies are directly related to the statutory tests for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The scale of the wind farm is unprecedented in this area, with large turbines situated close to the shoreline, raising critical concerns about landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on vague mitigation strategies, evidential shortcomings, and clear breaches of policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species 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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed and lacks the necessary evidence to support its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. However, the application fails to provide adequate proof that these species will not be adversely affected by the proposed project. The location of the development falls within critical foraging areas and migratory pathways, yet the assessment does not thoroughly examine the potential risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application itself, as the developer asserts that there are no significant adverse effects while simultaneously putting forth 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 its conclusions lack solid support from the underlying evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been comprehensively considered, and reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the inadequacies in baseline data and the incomplete understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor adds a substantial risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term effects 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 standards necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This engages the precautionary principle and renders any conclusion in support of consent unlawful.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological deficiencies, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and ultimately support the conclusion that the application does not meet the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static assets, without recognising 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 locations serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to acknowledge the impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

Furthermore, the application overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, representing a significant omission. Without factoring in these aspects, the cultural impact of the development cannot be understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. 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.

Compounding these issues 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 is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating 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 evaluation process. While the developer has engaged in the collection of data through focus groups with local residents, the failure to publish the full report creates a significant evidential gap. This gap inhibits both public understanding and the competent authority's ability to fully assess the social risks identified through the developer's own research.

Evidence suggests that residents are currently facing measurable stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. However, the absence of the complete assessment restricts proper scrutiny of the findings, thereby limiting the capability to evaluate their significance in the decision-making framework.

Furthermore, there is substantial indication that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings highlighting a risk of "cultural loss." Despite the recognition of these impacts, they have not been adequately incorporated into the main application nor given the necessary weight in the evaluation process. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency are far-reaching, as it undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset means that the application lacks a comprehensive evidential basis needed to assess the balance between benefits and harm effectively.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. The development is required to support positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this essential policy cannot be established.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential standards outlined in 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 deficiency obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to be properly considered.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly inadequate, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not adequately illustrate the extent of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment fails to effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. There is evidence to suggest that these viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, casting doubt on the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the surrounding landscape and the Atlantic horizon. The evaluation treats these sites as isolated entities, overlooking their interdependence and resulting in an incomplete assessment of their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and disconnecting them from their natural context. This not only presents a visual impact but also signifies broader cultural and spatial harm, which has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

The identified impacts are inherently unmitigable. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change to the landscape is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage.

These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in enhancing environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, which would be visible over long distances, is set to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to assess the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly crucial given the value of dark skies to the identity of the area and its emerging tourism sectors, such as astro-tourism. The lack of consideration for these impacts indicates a significant deficiency in the overall landscape and environmental assessment.

Equally concerning is the absence of an evaluation regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collisions. The proposal does not include any form of lighting impact assessment or phototaxis study, thus neglecting to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This deficiency is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, the omission contravenes the National Planning Framework 4 regarding the safeguarding of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider analysis of landscape and seascape impacts, as the character of night-time is an integral component of the environment.

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

TOURISM

The proposal does not adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis. Tourism relies heavily on the area's 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 lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution to the area.

Tourism has seen significant growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the potential effects of the industrialisation of the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would provide a net economic benefit or detract from an established and expanding sector.

Additionally, the assessment does not take into account the crucial role of environmental quality in tourism. The significance of unspoiled landscapes and dark skies is essential for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortfall, resulting in a notable absence of understanding regarding the impacts on a recognised and growing aspect of the local economy.

In an island community that has limited economic diversification, not evaluating the tourism impacts has broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been analysed 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 necessity to show net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the lack of quantification regarding tourism impacts, the absence of an assessment of the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies create a significant gap in evidence. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for the proposal. The use of an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways—including nocturnal wildlife, complete onshore infrastructure, and tourism effects—render the Environmental Impact Assessment inadequate. This incompleteness prevents a comprehensive understanding of likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duties established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus deeming the application unfit for determination.

In addition, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. The application fails to confirm that health and wellbeing impacts are acceptable and lacks tourism impact modelling, preventing it from evidencing a net economic benefit. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to 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 satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impacts 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 policy conflicts and unresolved environmental risks, obstructs any lawful and evidence-based decision-making. It is

essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of the necessary missing information.

Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be 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: B3E31B7C

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. A thorough review of the Environmental Impact Assessment Report and its accompanying documents reveals significant deficiencies across planning, environmental, cultural, 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 rich cultural identity. The concerns surrounding the scale, proximity, and design of this proposal fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application is critically lacking in an evidential basis necessary for lawful determination. There is a troubling absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined, hindering any clear understanding of the likely significant effects. Furthermore, the use of a flexible design framework complicates the assessment, and the unspecified mitigation measures mean their potential effectiveness remains unknown. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are also evident. 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 convincingly demonstrate adherence to national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, jeopardising the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of this proposal introduces additional concerns, with large turbines situated in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. Given these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient detail and does not adequately account for the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, without fixed turbine dimensions, layouts, or configurations, creates significant uncertainty. This undermines the assessment's integrity, as the impacts discussed may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be addressed later hampers any meaningful 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 stipulates that likely significant effects and mitigation strategies should be clearly identified before a determination is made.

Moreover, there are notable evidential deficiencies present, including gaps in baseline data, methodological limitations, and a dependence on assumptions instead of site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

Overall, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data all contribute to making the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The application presents a narrative account of project evolution instead of a structured, reasoned comparison of realistic alternatives based on environmental effects. This failure to

properly identify, assess, and select less harmful options in favour of more damaging solutions is concerning.

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

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

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is both sensitive and biologically rich, yet the available baseline data is inadequate, and the methodologies employed do not sufficiently document species presence, behaviour, or habitat usage. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their use of coastal areas for foraging and movement. The failure to evaluate their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been sufficiently examined. This gap

undermines any assertions regarding a lack of significant effects on this species.

In addition, the assessment of basking sharks is problematic. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The failure to adequately incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions presented.

The limitations in methodology result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and broader ecosystem interactions. This situation raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies regarding the ornithological assessment, raising serious concerns about its reliability. Key evidence gaps and internal inconsistencies challenge the conclusions drawn, particularly given the presence of internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline. The proposal does not adequately demonstrate that these species will not face adverse impacts, despite their crucial presence in key foraging areas and migratory pathways. The assessment fails to thoroughly evaluate critical aspects such as displacement, collision risk, and habitat loss.

Furthermore, a fundamental contradiction within the application arises from the developer's assertion of no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency undermines the assessment's reliability and suggests that the findings are not substantiated by the evidence provided. Specifically, the assessment lacks sufficient proof that seabirds linked to protected sites, such as the

Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively addressed, and the modelling techniques employed add an element of uncertainty, particularly concerning species such as Kittiwakes and Fulmars that are already in severe decline. The methodologies used appear likely to underestimate potential mortality rates, especially given incomplete baseline data and a lack of understanding regarding behavioural responses.

The siting of turbines within a designated migratory corridor further elevates the associated risks, creating a barrier in a primary flight path that is utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term repercussions of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation activates the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

In addition, the identified deficiencies signify a lack of compliance with the National Planning Framework 4 concerning the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly contravenes national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of robust evidence. These inadequacies hinder a thorough evaluation of potential impacts and collectively support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is not merely a geographical area; it embodies a living cultural landscape where environment, language, tradition, and community interlink deeply. The assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a series of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community. This reductive approach fails to acknowledge the integral nature of these cultural elements.

A significant shortcoming is evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features. This oversight neglects their continuous use and meaning, resulting in an incomplete understanding of the cultural effects and disregarding their significance within community life.

The application also neglects to assess intangible cultural heritage, including the

Gaelic language and traditions that form the foundation of community identity in the area. This omission is notable as these elements are vital to understanding the cultural impact of the development. Without their inclusion, the assessment remains deficient and fails to capture the true cultural cost of the proposed development.

Additionally, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised as having the characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, a significant procedural failure exists due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy perspective, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sufficient basis for evaluating the genuine cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing assessment is deeply concerning and fundamentally undermines the evaluation process. Although a Social Impact Assessment was commissioned by the developer, which included engagement with local residents, the complete report has not been made available. This significant gap in evidence means that both the public and the competent authority are unable to grasp the full extent of the social risks that the developer's own research has identified.

Residents have reported experiencing significant stress, anxiety, and concern as a result of the scale and proximity of the proposal, and these impacts stem from direct engagement rather than speculation. The inability to access the full assessment limits the opportunity for proper scrutiny of these findings, impeding the ability to evaluate their significance in the decision-making process.

There is also a clear perception that the proposal threatens community identity and

cohesion, with indications of potential "cultural loss" noted in the developer's findings. Despite this, these critical impacts have not been adequately integrated into the main application or weighted appropriately. The withholding of the full Social Impact Assessment obscures the real 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 nature, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not offer a comprehensive evidential foundation needed to assess the balance between benefits and harm effectively.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy becomes impossible.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This lack of sufficient information ultimately hinders a lawful determination regarding the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided with the application. Instead, it relies on mitigation and contingency measures that are to be prepared post-

consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline is known for its clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Additionally, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By deferring contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place to respond to pollution events, introducing procedural risk that hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

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

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a diverse marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show how these habitats and uses can be preserved without significant disruption.

One major concern lies in the assumption that fishing activities can be relocated without repercussions. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can sustain increased pressure. This gap in

information is crucial, as the potential for overfishing in other areas due to displacement poses risks to the local fishing fleet's economic viability. An absence of a clear, evidence-based assessment means that the consequences for both fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is expected to cause significant disturbances across wide areas, potentially affecting species like dolphins. The predicted impact on a large portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these concerns without adequate supporting evidence.

There is also a notable inconsistency in the application regarding the acknowledgement of the need for licenses to permit harm to European Protected Species, while simultaneously characterizing impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about adherence to the Habitats Regulations, especially where expected harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The assessment of onshore infrastructure is materially incomplete and does not consider the full extent of impacts from what is a single integrated project. The offshore

turbines and onshore components are interconnected; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects, as excluding or deferring the assessment of onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed together, yet the separation of onshore and offshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant concern. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in sectors like astro-tourism. The proposed installation of permanent red aviation lighting, visible across long distances, would create an intrusive “wall of light” effect that fundamentally alters the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly troubling given the importance of dark skies to the area's identity. Furthermore, there is no assessment of how this lighting may affect nocturnal wildlife.

Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can disorient them and increase their risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and related mortality risks remain unexamined.

This shortfall is exacerbated by the use of daytime survey data in the ornithological assessment, which overlooks nocturnal activities and their associated dangers. Species like Kittiwakes, known to forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data presents a critical gap in understanding the ecological implications of the proposal.

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

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the need to protect natural places and uphold environmental quality. Moreover, they compromise the overall evaluation of landscape and seascape impacts, as night-time character is an essential component of the environment.

Overall, the absence of an assessment focused on dark skies and nocturnal wildlife represents a substantial evidential deficiency. 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 inadequate and neglects to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscapes, dark skies, and sense of remoteness. It is noted that 86% of visitors are attracted by the scenery; however, the application does not provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution they make.

Tourism on the Isle has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this notable growth, the application fails to evaluate how the potential industrialisation of the seascape and degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this essential analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. This is increasingly pertinent for burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the implications for a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to evaluate the impact on tourism carries broader consequences for employment, local enterprises, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a key growth sector, lacking sufficient evidence for the competent authority to assess the economic implications of the proposal.

In summary, the failure to quantify tourism impacts, to assess the environmental factors that drive visitor behaviour, and to consider the island's economic dependence culminates in a significant evidential gap. This undermines 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 represents a significant shortfall in meeting the criteria for sustainable development as mandated by statutory responsibilities, national policy, and evidential standards. It echoes the key issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is being considered under a more robust policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

There is a lack of a comprehensive and reliable evidential foundation for this application. Notably, there are substantial deficiencies in baseline data, the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and critical omissions regarding impact pathways, which include nocturnal wildlife, complete onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects or residual impacts.

Procedural inadequacies are evident as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact

Assessment represents a significant omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural landscapes, and cultural heritage. There is insufficient evidence to support that health and wellbeing impacts are acceptable, nor is there demonstrable net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The plethora of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is compelled to either refuse consent on these grounds or invoke the appropriate regulatory provisions to necessitate the submission of the required missing information.

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

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: 0D7AE90B

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted for consideration under the appropriate marine licensing and Environmental Impact Assessment frameworks. The basis for this objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, nearly untouched environment, and a strong sense of cultural identity. The dimensions, proximity, and design of the proposed wind farm raise critical questions about its alignment with statutory obligations, national policy guidelines, and the principles underlying sustainable development.

The application notably lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data has not been provided, and the baseline information available is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the assessment of potential significant effects, and the proposed mitigation measures remain unspecified, rendering it impossible to evaluate their efficacy. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, there are significant and clear conflicts with established policy. 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 health and wellbeing. It fails to adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for obtaining consent and compromise the capacity of the competent authority to determine the acceptability of the development from a policy standpoint.

The unprecedented scale of this proposal in the given location, featuring large turbines in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy underscores that the application is incomplete and unable to substantiate a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the consistent application of a worst-case scenario. This compromises the assessment's integrity, meaning that the impacts outlined may not accurately represent the development that will eventually be constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought with the assumption that environmental harm will be managed at a later date. This prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. The deferral of crucial information to stages post-consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be thoroughly established before determination.

There exist significant evidential shortcomings, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These deficiencies lead to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential standards set forth in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, thereby preventing the competent authority from making an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in a lack of a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the methodologies employed and the baseline data provided are insufficient to capture the presence, behaviour, and habitat use of the relevant species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies undermine the ornithological assessment, casting doubt on the reliability of its conclusions. The presence of contradictory findings raises questions, particularly given that a Habitats Regulations derogation case is only necessary where significant harm is anticipated. This inconsistency suggests that the assessment does not provide adequate support for 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. Critical foraging areas and migratory pathways are located within the development site, yet the assessment fails to robustly evaluate the potential implications of displacement, collision risk, or habitat loss. Furthermore, the assessment does not adequately address the importance of feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline.

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

These 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 remain unaffected places the proposal in direct conflict with national policy.

Taken together, the shortcomings in the assessment—marked by internal inconsistency, methodological weaknesses, and insufficient evidence—prevent a thorough evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in support of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape in which the environment, language, traditions, and community are deeply interconnected. The approach taken reduces heritage to a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles in the community.

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

exemplify a significant oversight. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features, with the assessment disregarding their continued use, significance, and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and overlooks their integral role in community life.

Moreover, there is a troubling absence of consideration for intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These elements are pivotal to the area's identity but are entirely neglected in the assessment, indicating a substantial gap in understanding the cultural impact of the proposed development.

The application also demonstrates a lack of engagement with community rights, particularly regarding the Gaelic-speaking population, which possesses distinct cultural identity characteristics recognised as those of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises concerns about the legitimacy of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the failure to provide a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies position the proposal in direct contradiction to the National Planning Framework 4, especially concerning the preservation of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear violation of policy requirements.

In conclusion, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sufficient basis to assess the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing raises serious concerns about the evaluation's validity. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the complete report has not been made available, creating a significant gap in evidence. This absence of information obstructs both public understanding and the competent authority's ability to assess the social risks identified by the developer's own research.

Existing summaries reveal that residents are facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal. These findings stem from direct community engagement rather than speculation. Nevertheless, the failure to disclose the entire assessment hampers scrutiny of the results and limits the capacity to ascertain their relevance within the decision-making process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. However, these impacts have not been adequately incorporated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the actual social and human costs associated with the development.

This transparency issue undermines the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for projects of this magnitude, particularly when community character and functioning may be influenced. The application's failure to provide the full dataset means it lacks a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet current evidence suggests existing negative effects have not been fully revealed. Without the complete assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, makes the assessment incomplete and unreliable. This situation hinders lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines close to the West Lewis coastline threatens to fundamentally alter the character of this sensitive environment. This area is characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. The introduction of such industrial structures would create a continuous and dominant presence along the shoreline, leading to a permanent and irreversible transformation of the landscape.

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities of naturalness and

remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of visual viewpoints. 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 high-value landscapes. This raises concerns that the potential visual impact has been underestimated, which undermines the reliability of the overall assessment.

Another critical gap is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their surroundings, with visual and spatial relationships tied to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete assessment of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This signifies not just a visual impact, but also a broader cultural and spatial detriment that has not been sufficiently examined within the application.

From a policy standpoint, this proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The anticipated scale of change contradicts the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further undermines any claims of compliance with policy.

The detrimental impacts identified cannot be adequately mitigated. The scale, height, and proximity of the turbines ensure their presence would be both dominant and unavoidable. Consequently, the change is fundamental and permanent, resistant to reduction through mitigation measures.

In conclusion, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These inadequacies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of

their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is also ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly outlined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is applicable to potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Moreover, the deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether adequate safeguards are established to respond to pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents substantial risks to marine species, particularly due to underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, across large distances. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious; however, the application downplays the significance of these effects, lacking sufficient supporting evidence.

Furthermore, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off

the West Lewis coast support both a diverse marine ecosystem and an active fishing industry. Nevertheless, the application does not convincingly demonstrate that these vital uses and habitats can be preserved without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant omission risks overfishing in other areas and may lead to broader economic ramifications for the local fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

There are notable inconsistencies within the application regarding the need for licences to permit harm to European Protected Species, which are acknowledged while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises compliance concerns with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

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

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

In light of these deficiencies, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions, the assessment remains incomplete and unreliable. These shortcomings obstruct a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a proposal that includes significant onshore infrastructure, which is fundamentally interconnected with offshore elements. However, the assessment provided is materially incomplete and fails to consider the full range of impacts associated with this single integrated project. The separation of the assessment for offshore turbines and onshore works results in a fragmented approach, obscuring the true scale of both environmental and socio-economic effects.

The onshore infrastructure involves cabling across protected moorland, the construction of a substation near Stornoway, and associated access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive

habitat. As the application lacks a comprehensive assessment of these impacts, it prevents a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be considered in tandem. The current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain insufficiently understood.

Furthermore, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not establish that impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

The proposal also raises pertinent concerns regarding carbon balance. The disturbance of peatland is likely to release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue or provide evidence that the overall carbon balance is maintained as beneficial.

Additionally, the routing of infrastructure through active croft land creates possible conflicts with existing land use and legal rights. There is no evidence presented that indicates the necessary consents or processes have been initiated, casting doubt on the deliverability and lawful execution of the project.

From a policy standpoint, the failure to assess the project holistically, alongside demonstrating 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity,

landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to evaluate the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

This gap is made worse by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, known to forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

Without evaluating these nocturnal impacts, it is impossible to determine if protected species or designated sites would face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, triggering the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The application acknowledges that 86% of visitors are drawn by scenery. However, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers or overall economic contributions. The assessment of tourism impacts is materially deficient, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is fundamentally dependent on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this significant increase, the application neglects to model how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the region. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely impact this established and growing

sector.

Additionally, the assessment overlooks the vital role of environmental quality in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experience, as well as emerging markets such as nature-based tourism and astro-tourism, are not addressed. The absence of a Dark Skies Assessment further exacerbates this oversight, creating a significant gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community with limited economic diversification, the failure to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

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

The collective failure to quantify tourism impacts, assess environmental drivers of visitor behaviour, and consider the island's economic dependency results in a considerable evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm 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

I find it dreadful an island council, nor any inhabitant could even consider any wind farm development anywhere in the Outer Hebrides - A place rich in culture, heritage, marine & unique nature surrounding us. The cost to our environment is huge, to Scotland as a whole, I begrudge any MP in this country who backs these monstrosities, environmental polluters on our precious land, There is no going back, once our unique biodiverse soil is polluted by carcinogenic poisons, short term financial gain for politicians, zero gain to small island communities - The danger of these monstrosities are now widely known, fire hazards, they are hardly ever running and the consumer pays to keep them switched off & will pay for another decade to come for the infrastructure, along with exorbitant billing - These companies must think we are all buttoned up the

back.

The amount of debris left behind by Northland Power is absolutely vile, who do they think they are to dump their trash all across Harris, especially over the Clisham - Do they think no one is watching what they are up to?

Does the council and MPs' have no conscience when it comes stranded whales in their dozens? What effect is this having under the sea? We share this planet with a diverse amount of creatures, who decides it is within their rights to remove someone's home, be it a tiny ant to a bird of prey's nest? People who are driven by money, greed & a sense of entitlement, that is who.

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: 2E47F3B3

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which is currently under marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents, highlighting deficiencies in planning, environmental aspects, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area with a coastline facing the Atlantic, known for its near-pristine environment and strong cultural heritage.

Concerns arise due to the unprecedented scale of the proposal, which features large turbines placed close to the shoreline. This positioning raises significant issues related to landscape capacity, visual impact, and overall environmental effects. The application lacks a solid evidential foundation for lawful determination, missing critical environmental data, while baseline information is often inconsistent or insufficient. Many key aspects of the proposal remain unclear, and the flexible design framework obstructs a comprehensive understanding of potential significant effects. Furthermore, the proposal relies on unspecified mitigation measures, rendering it impossible to assess their effectiveness. As a result, the available documentation does not provide a thorough understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack strong evidential support.

Substantive policy conflicts exist, with the proposal appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly impact the statutory tests for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fundamentally lacks the necessary clarity regarding its potential environmental impacts, leaving serious questions unanswered. The Environmental Impact Assessment Report fails to deliver a comprehensive and transparent evaluation

of the proposal's likely environmental effects. A notable issue is the use of a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. As a result, the impacts presented may not accurately represent the actual development, depriving both the public and the competent authority of a true understanding of the potential environmental consequences.

Moreover, the application is heavily dependent on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. Seeking consent under these conditions means that environmental harm will supposedly be addressed later, which renders any meaningful evaluation of effectiveness or assessment of residual impacts impossible. This procedural deferral of critical information contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

There are also severe evidential gaps that undermine the assessment. These include inadequacies in baseline data, methodological limitations, and reliance on unverified assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty about the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are asserted without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot comply with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated by the Habitats Regulations, failing to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, the lack of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution. This

deficiency indicates that the developer has not properly identified, assessed, or selected less harmful options over more damaging ones.

There is a notable absence of transparent comparisons regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has considered positioning the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and the significance of proximity to shore in determining impact makes the lack of such analysis a critical flaw. Consequently, it is impossible to ascertain that the proposed siting is indeed the least damaging option.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This oversight includes regions of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy or comparative analysis suggests that mitigation by design has not been adequately applied, relying instead on measures that come into play after the design phase.

As a result, the application does not demonstrate that environmental harm has been effectively minimised through site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, leaving the competent authority without a clear understanding of whether less harmful and more appropriate alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of thoroughness undermines adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, leading to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species related to the application lacks completeness and reliability, failing to adequately understand the ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data provided is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, there is insufficient evidential support for evaluating potential impacts.

A significant shortfall in the assessment is the inadequate recognition and evaluation of otters, which are classified as a European Protected Species. The application does not consider their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural habits results in an incomplete

understanding of the possible effects of construction-related disturbance, noise, and increased activity. This lack of assessment weakens any claims regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks is also flawed, primarily due to an over-reliance on aerial surveys that introduce a considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate their presence, particularly when contrasted with established land-based observations which show frequent use of these waters. The neglect to incorporate or adequately consider such relevant data results in a deficient baseline, further undermining the reliability of the conclusions drawn.

The methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The degree of uncertainty introduced by these deficiencies prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these factors, it is not lawful to grant consent.

Overall, 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, ultimately leading to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, suffering from significant evidence gaps and internal contradictions that severely compromise its conclusions. The site on the west coast of the Isle of Lewis is critical for internationally significant seabird populations, which are already experiencing declines. However, the application fails to adequately demonstrate, to the required evidential standard, that these species will not be adversely impacted. It is situated within vital foraging areas and migratory routes, yet the assessment inadequately addresses the potential consequences of displacement, collision risks, or habitat loss.

Contradictions are evident in the application as the developer claims there are no significant adverse effects while concurrently submitting a Habitats Regulations derogation case, necessitated only where significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability, suggesting that the

conclusions drawn are not substantiated by the underlying evidence.

The assessment lacks sufficient proof that seabird species 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 the reliance on modelling methodologies introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. There is a high likelihood that mortality rates are underestimated due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the location of turbines within a recognised migratory corridor poses a considerable risk, potentially creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor and the impact on species with small global populations have not been thoroughly assessed.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory assertions, combined with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

Overall, the identified deficiencies highlight a failure to comply with the National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where environment, language, tradition, and community are interconnected. However, the assessment adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

One major oversight is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places for burial and spiritual practice, yet they are mischaracterised as static features, neglecting their continued use and significance. This lack of understanding diminishes the evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These elements are fundamental to the area's identity but have been completely omitted, which is a considerable shortcoming. The absence of these factors leads to an incomplete understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as Indigenous People, has a unique cultural identity. Yet, no process of Free, Prior and Informed Consent has been implemented, which undermines the assessment's legitimacy and fails to adhere to established participation principles regarding decisions that affect cultural and environmental interests.

Additionally, a critical 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 the social, cultural, and economic impacts on the island community, resulting in an unlawful determination.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices constitutes a significant departure from policy requirements.

In summary, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been sufficiently assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available, resulting in a significant evidential gap. This lack of transparency not only inhibits public understanding but also affects the competent authority's ability to evaluate the full extent of social risks identified in 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 reported impacts stem from direct engagement with the community and are not speculative. However, the inability to access the full assessment hampers proper scrutiny of these findings and restricts an informed decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" recognised in the developer's findings. Despite this acknowledgement, these significant impacts have not been adequately reflected in the

main application. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, undermining the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is essential for developments of this magnitude, particularly when community character and functionality could be affected. The application, in failing to provide comprehensive data, does not present a complete evidential basis for weighing the benefits against potential harm.

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

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

In conclusion, the failure to disclose the full Social Impact Assessment, combined with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This lack of comprehensive information obstructs a lawful determination, further reinforcing the view that the application is inadequately supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed development is significantly flawed and fails to capture the true scale of change and the sensitivity of the surrounding environment. The West Lewis coastline, characterised by its expansive Atlantic horizon, unspoiled nature, and profound sense of isolation, would be profoundly affected by the presence of large-scale turbines situated near the shore. Such an industrial presence would fundamentally transform this unique character, leading to an irreversible alteration of the landscape.

Moreover, the application inadequately reflects the extent of visual change that would ensue. The size and closeness of the turbines would dominate views from local residential areas, historically significant sites, and popular coastal spots. This intrusion would detract from visual amenity and compromise the cherished qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts, particularly given the sensitivity of the landscape in question.

Concerns regarding the methodology employed in selecting and presenting visual viewpoints are also evident. There is compelling evidence to suggest that the chosen viewpoints do not adequately capture the experience of the most sensitive receptors or

the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impacts have been underestimated, thereby compromising the credibility of the assessment.

Additionally, the assessment fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a larger landscape that is visually and spatially connected to the Atlantic horizon. By treating these heritage assets as isolated features, the assessment overlooks their interdependencies, resulting in an incomplete understanding of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these vital relationships, affecting how heritage assets are perceived and severing their ties to the natural horizon. This constitutes not just a visual disturbance but also a more extensive cultural and spatial detriment that has not been thoroughly evaluated within 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 scale of proposed change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines guarantee a dominant and unavoidable presence. Thus, the anticipated changes are fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately convey the extent of impact, the sensitivity of the environment, and the intertwined relationship of landscape and heritage. These shortcomings inhibit a credible evaluation and reaffirm the position that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities within a dynamic Atlantic environment. However, the assessment of construction and pollution risks is lacking in completeness and fails to provide the necessary detail for evaluating the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The application instead leans on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

The absence of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application inhibits the assessment of whether sufficient safeguards exist to address

potential pollution events. This procedural risk undermines the capacity of the competent authority to evaluate environmental protection measures at the time of determination.

Moreover, there are considerable uncertainties concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Robust modelling and clearly defined management strategies are necessary to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

The application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills but lacks sufficient detail on the preventative, control, or monitoring measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination, highlighting the sensitivity of the receiving environment.

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 assessed before consent is granted, and without such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the combined lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These issues hinder a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic effects. The coastal waters of West Lewis are home to a rich marine ecosystem and an active fishing industry, yet the application does not sufficiently demonstrate that these habitats and uses can be protected or sustained without major disruption.

One of the critical concerns is the assumption that fishing activities can be displaced without significant repercussions. The application lacks evidence that there are alternative fishing grounds which are accessible and can handle additional fishing pressure. This gap is particularly important, as the potential for displacement could lead to overfishing in other areas, with broader economic implications for the local fishing fleet. Without a comprehensive and evidence-based analysis, the impacts on fisheries and the livelihoods that depend on them remain unclear.

Furthermore, 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 extended periods is expected to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns; however, the application downplays these effects without providing adequate supporting evidence.

There exists an apparent contradiction within the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal approval.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the assessment of onshore infrastructure, which is materially incomplete. The offshore turbines and onshore works are intrinsically linked and should be considered as a single integrated project. However, they are assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore elements of the project include cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure through sensitive landscapes. These activities involve excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which prevents a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application restricts the proper evaluation of cumulative effects. The Environmental Impact Assessment

process mandates that all components of a project be considered together. The separation of offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This creates a significant evidential gap in relation to biodiversity protection.

The proposal also raises important issues regarding carbon balance. The disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this matter or show that the overall carbon balance is beneficial.

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

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

In conclusion, 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, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, the application does not examine the consequences of artificial lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's

Storm Petrel are particularly susceptible to artificial light due to phototaxis, which increases disorientation and collision risks. The lack of a lighting impact assessment or a phototaxis study means that the proposal does not adequately evaluate how aviation lighting may endanger these species or contribute to mortality.

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

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

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

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having risen from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application fails to assess how large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the area's scenery. The absence of a comprehensive evaluation on how the industrialisation of the seascape and a decline in environmental quality would influence Tourism Gross Value Added or broader economic resilience raises concerns about potential negative repercussions on this vital sector.

Moreover, the assessment neglects the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies for enhancing visitor experiences and promoting emerging markets like nature-based tourism and astro-tourism. This gap is further exacerbated by the lack of a Dark Skies Assessment, which is crucial for understanding impacts on this recognised and growing segment of the local economy.

Given that the island community has limited economic diversification, the failure to analyse the impacts on tourism has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as stipulated 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 also contradicts strategic objectives that highlight tourism as a key growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposal.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

There are significant gaps in the evidential basis for the proposal, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the application lacks clarity regarding mitigation measures and does not address crucial impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the net

economic benefit of the project. Furthermore, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring potential 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 often inconsistent. The evidential standard required to confidently rule out adverse effects has not been achieved, necessitating the application of the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

I am grateful for all the above headings which help me put forward all the objections that swirl around in my head but I'm unable to put down in writing.

Please understand there are many people on our island who are angry, upset and gravely concerned about our future here if the commercial sea turbines (with all the associated infra structures) are approved.

We realise that government bodies only think of money, without understanding the consequences of selling our island out.

This is much, much more than spoiling beautiful views and if this goes ahead you will find out- too late!

I do not have an issue with a community turbine serving the community but this proposal is pure greed with no regard or benefit to those living here. Highland Clearances all over again. We assume the same mistakes will never happen again but sad to say they do.

Trying to say it's all for climate change unfortunately makes it worse as sensible folk realise this is actually destroying everything and for no purpose- apart from great

financial gain to the company and some pocket money for the few greedy people who have the authority to approve this proposal.

I wish you all realised how embarrassed your families will be in the future as they live in their panelled houses knowing how you treated people and the planet for your own gain.

I must stop now but suffice to say I STRONGLY OBJECT as do also the vast majority of those I speak to (although most feel nobody will listen to them) but I will always know I used my voice.

May you come to your senses before it's too late.

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: F44850DA

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

The proposal is marked by clear and substantive conflicts with established policies. It is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to deem the development acceptable within policy frameworks.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to adequately account for the likely environmental effects of the proposal. The application utilises a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, which introduces significant uncertainty. This lack of commitment prevents a consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will be constructed, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and conflicts with the Environmental Impact Assessment regime's objective, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it cannot be confirmed that 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, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies impede a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot accurately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete or reliable understanding of the

ecological receptors present. The baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of the species in this area. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

A significant oversight in the application pertains to otters, which are a European Protected Species. The failure to properly recognise and assess their active use of coastal areas for foraging and movement is troubling. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity have not been adequately evaluated. This lack of assessment undermines any conclusions regarding the absence of significant effects on otters.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such important data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The inadequacy of baseline data also hinders meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The level of uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability and adherence to regulatory standards. It indicates that the west coast of the Isle of Lewis, home to internationally important seabird populations, is not adequately protected. Many of these species are already in decline, yet the application fails to provide sufficient evidence that their interests will not be adversely impacted. The

turbines are sited within vital foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss remain poorly evaluated.

A critical inconsistency undermines the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated, calling the credibility of the assessment into question. Furthermore, the application does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling approaches adds uncertainty, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses an additional risk by effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly consider the long-term consequences of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, preventing a lawful conclusion in favour of consent.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is fundamentally flawed due to internal inconsistencies, methodological shortcomings, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided for the proposed development overlooks vital aspects of cultural heritage and community identity, particularly in relation to the West Lewis coastline. This area embodies a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these dynamic relationships, the application reduces heritage to a collection of static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming in the assessment is its treatment of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are presented as static features, disregarding their continued use and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks the role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship that the community has with the coastal environment. These elements are critical to the area's identity but are completely missing from the assessment, indicating a significant oversight. Without acknowledging these factors, the full cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised under the characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters that affect cultural and environmental interests.

Additionally, there is a critical procedural flaw due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination of the application.

From a policy standpoint, these oversights create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, and the recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and the necessary statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing lacks the necessary transparency for a lawful assessment. While a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made available. This absence of information creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's

research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not mere speculation. However, the failure to disclose the complete assessment prevents thorough scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been sufficiently integrated into the application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, particularly those that may affect community character and functioning. Without the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that have not been fully revealed. Without the full assessment, compliance with this policy cannot be verified.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of potential construction and pollution risks is insufficient and lacks the necessary detail to evaluate environmental effects adequately. The proposal entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, thus hindering any meaningful assessment of their adequacy or effectiveness.

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

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application fails to allow for the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated before consent, and the absence of this 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 combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

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

that these habitats and uses can be safeguarded from disruption.

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

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

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

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

From a policy viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. Consequently, it cannot be concluded that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore components include cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. This work involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 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 proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, however, emerges under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are critical gaps in the evidential basis provided for decision-making. The application is marred by an undefined design envelope, missing key mitigation measures, and omissions concerning the impacts on nocturnal wildlife, onshore

infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of significant effects and residual impacts.

Procedural missteps are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a significant omission. These inadequacies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

This proposal is fundamentally at odds with the National Planning Framework 4. It fails to ensure the protection of biodiversity and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, there has been inadequate assessment of the cumulative impacts of both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks posed by the proposal are not only uncertain but potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The requisite evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal also threatens to cause considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption to cultural and visual relationships, alongside tourism impacts, will result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of information gaps, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or exercise relevant regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

This island is a historical and unique place, to put wind turbines up knowing the cost and durability of the installation and turbines themselves is madness, no thought to the residents of the island the animals, the history,, tourism, which the islands rely on. Its has no benefit and when that is finally proven we will be left with towering eyesore that will be left rotting away ..

The facts and figures on the damage and expense of this proposal are heartbreaking,, very sad days for the whole island and everything that was living peacefully here....

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: FB2F8157

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant 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 proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, failing to deliver a thorough and dependable insight into the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity; however, the baseline information is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, or habitat utilisation. Consequently, the assessment does not furnish a solid evidential foundation for impact evaluation.

The assessment's shortcomings are particularly evident in its treatment of otters, a European Protected Species. The application inadequately acknowledges their active use of coastal zones for foraging and movement. By neglecting to consider their primary foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased human activity remain poorly assessed. This oversight diminishes the validity of any conclusions regarding significant effects on this species.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underreport their presence, especially when compared to established land-based observations that indicate their frequent use of these waters. The disregard for such crucial data results in an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological issues lead to findings of negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced prohibits the exclusion of 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, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a comprehensive evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings that undermine its reliability and the conclusions drawn within it. A considerable inconsistency exists, as the developer claims there will be no significant adverse effects while simultaneously pursuing a

derogation case under the Habitats Regulations, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the validity of the assessment, suggesting that the findings are not substantiated by the available evidence.

The ornithological assessment is notably flawed, containing substantial gaps in evidence and internal inconsistencies. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in proximity to the proposed development, yet the assessment does not thoroughly consider the implications of displacement, collision risk, or habitat loss.

In relation to protected sites, the assessment does not convincingly show that seabird species associated with areas such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces a degree of uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality, particularly when baseline data is inadequate and behavioural responses are not entirely understood.

Moreover, the placement of turbines within a known migratory corridor poses an additional, substantial risk. This 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 in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold needed to affirm that there will be no adverse effect on the integrity of protected sites. The combination of conflicting conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

The identified deficiencies also indicate a failure to adhere to 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 at odds with national policy.

In summary, these weaknesses in methodology, evidence, and internal consistency render the assessment unreliable. These flaws hinder a thorough evaluation of impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of 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 proposal currently under consideration has significant deficiencies concerning 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 complete report has not been made public. This lack of transparency results in a considerable evidential gap, which hinders both public understanding and the competent authority's ability to comprehend the full extent of social risks identified in the developer's own research.

Summaries that are available suggest that residents are already experiencing

measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are thus grounded in evidence rather than speculation. Nevertheless, the failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings and restricts the determination of 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 findings from the developer identifying “cultural loss.” Despite this, these significant impacts have not been adequately integrated into the main application or assigned appropriate weight. Consequently, the withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis for evaluating the balance between potential benefits and harms.

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

The procedural implications are considerable. The competent authority cannot perform a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts and the seascape and landscape effects of the proposed development is fundamentally flawed and does not adequately account for the extent of change or the vulnerability of the environment it will affect. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a natural setting, and a pronounced sense of seclusion. The introduction of large turbines in close proximity to the coast would create a persistent and overwhelming industrial presence, which would fundamentally change this character and lead to a permanent and irreversible alteration of the landscape.

The application does not sufficiently capture the extent of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots, directly impacting visual amenity and undermining the qualities that define the area's naturalness and seclusion. The assessment fails to adequately represent the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This oversight risks underestimating the visual impacts, compromising the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape setting, connected visually and spatially to the Atlantic horizon. By treating these assets as standalone entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete assessment of impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This situation represents not just a visual issue but a broader cultural and spatial detriment that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The magnitude of the anticipated changes is incompatible with the need to protect landscape character, visual amenity, and the contexts of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the impacts noted cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. The changes wrought would be fundamental and permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of the impacts, the sensitivity of the receiving environment, and the interconnectedness of the landscape and heritage. These shortcomings result in an unreliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. It proposes extensive 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. 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.

This reliance on unspecified future measures is concerning due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the methods for preventing, controlling, or monitoring these risks.

There is also ambiguity surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning to after consent, the application hampers the ability to evaluate whether suitable safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and when such information is absent, a lawful determination cannot be reached. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty about potential impacts render the assessment materially 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 waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern

lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

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

In summary, the deficiencies in the evidence concerning 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.

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 58B974A7

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 comprehensive review of the Environmental Impact Assessment Report and accompanying documentation has highlighted significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. Situated off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns regarding the development's compatibility with statutory obligations, national policy, and sustainable development principles arise due to its scale, proximity to the shoreline, and design features.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. Furthermore, the use of a flexible design framework obfuscates the understanding of potential significant effects, while the dependence on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed evaluation of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are evident and substantial conflicts with policy requirements. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national standards for protecting biodiversity, climate considerations, and environmental integrity. These policy conflicts directly impact the statutory tests essential for consent and jeopardise the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal, with large turbines placed in proximity to the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

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 application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to a materially inadequate assessment of alternatives. Instead of providing a well-structured and reasoned comparison of realistic alternatives based

on environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

The assessment lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an action that could potentially reduce visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the significance of proximity to shore in determining impact highlight the inadequacies in this analysis, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies are evident in cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, indicates a failure to apply mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight signifies a failure to adhere to the established mitigation hierarchy, thereby limiting the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been thoroughly evaluated and cannot sustain a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is deeply flawed. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. This deficiency undermines any valid evaluation of potential impacts.

Particularly concerning is the omission of otters, a European Protected Species, which have not been properly recognised or assessed for their active use of the coastal areas for foraging and movement. The lack of consideration of their core foraging range and behaviour raises significant concerns about the potential effects of construction disturbances, noise, and increased activity. Consequently, this oversight compromises

the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is inadequately addressed, relying on aerial surveys that introduce considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. This failure to incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that the findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding seagrounds is not adequately considered, and the reliance on

modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the application is fundamentally flawed, particularly concerning the treatment of the West Lewis coastline. This area is a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead of recognising this interconnectedness, the application adopts a reductive view that portrays cultural heritage as merely a collection of static assets, neglecting their active social, cultural, and spiritual roles within the community.

A notable shortcoming is the handling of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet the assessment treats them as fixed features, ignoring their ongoing use and significance. This misrepresentation leads to an inadequate understanding of cultural impacts and overlooks the vital role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the identity of

the area, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, but the absence of a Free, Prior and Informed Consent process compromises the integrity of the assessment. This lack of meaningful participation undermines the legitimacy of the findings and disregards established principles of engaging communities in decisions that affect their cultural and environmental interests.

Another critical procedural deficiency is the non-compliance with the statutory requirement for an Island Communities Impact Assessment as stipulated in the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, thereby rendering any determination unlawful.

From a policy standpoint, these failures place the proposal in conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly deviates from established policy requirements.

In summary, the overall lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant evidential gap. The application has not properly assessed the cultural impacts of the development, resulting in an insufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and significantly undermines the evaluation of social impacts, health, and wellbeing associated with this development. Although the developer conducted focus groups with local residents, the full report has not been made available. This gap in evidence hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own work.

Residents are already reporting measurable stress, anxiety, and concern related to the scale and proximity of the proposal, and these impacts arise from direct engagement rather than speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly or to appreciate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of "cultural loss." Despite this, these critical impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the full Social

Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This situation adversely affects the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly in terms of their effects on community character and functioning. The lack of the complete dataset undermines the application, preventing a thorough assessment of the balance between potential benefits and harms.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing, which stipulates that developments should promote positive health outcomes while avoiding harm. The available evidence suggests existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy without the complete assessment.

Procedurally, the implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a serious flaw within the application and indicates a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable assessment. This scenario not only obstructs a lawful determination but also reinforces the conclusion that the application lacks sufficient supporting 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 West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbance and contamination. The proposed development involves significant seabed preparation and installation works in a challenging Atlantic environment. However, the assessment of construction and pollution risks lacks the necessary detail to effectively evaluate potential environmental impacts. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, which undermines any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming given the fragile nature of the receiving environment. The application notes the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to detail how these risks will be prevented, controlled, or monitored. There is also a lack of clarity concerning the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts, including those on already identified sensitive marine species and habitats.

Moreover, the absence of well-defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and limits the ability of the competent authority to properly assess environmental protection measures before a decision is made.

From a regulatory standpoint, the failure to establish essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and necessary mitigation must be evaluated before consent is granted, and the absence of such information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and certainty regarding potential impacts results in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. The application fails to provide a robust evaluation of the ecological or socio-economic impacts, raising significant concerns about the protection and maintenance of these habitats and uses without substantial disruption. A critical issue lies in the assumption that fishing activities can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or capable of sustaining additional pressure. This lack of information is important, as the risk of overfishing in different areas poses potential wider economic implications for the local fleet.

Moreover, the proposal introduces considerable risks to marine species, particularly due to underwater noise from construction activities. The high-energy hammer piling anticipated over a prolonged period is expected to disturb marine life over extensive areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses the severity of these impacts without adequate

supporting evidence.

Additionally, there exists an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously minimising the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed due to the incomplete assessment of onshore infrastructure, which neglects to acknowledge the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically connected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and the development of access infrastructure through sensitive landscapes. The planned excavation across areas of deep peat, particularly in Barvas Moor, poses risks to a significant carbon store and an ecologically sensitive habitat. As it stands, the application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all facets of a project are considered collectively. The current separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Furthermore, the project raises serious concerns about sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the requisite consents or processes have been initiated, which raises significant concerns about the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal does not adequately address these critical concerns.

Significant gaps in baseline data and the continued use of an undefined design envelope undermine the reliability of the application. Additionally, it relies on unspecified mitigation measures and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, obstructing a comprehensive understanding of potential significant effects or residual impacts.

There are notable procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is a material omission. These deficiencies hinder the competent authority from accurately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to illustrate the protection of biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been adequately evaluated, obscuring implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The multitude of information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

In light of these issues, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

As I am not fully against wind farms I am to the full scale of the destruction of this whole island and it's surrounding seas in this whole project.

It is unnecessary to have wind farm and their whole required infrastructure in one tiny area and actually believe that it will not have dire consequences. This is human lives and a right to live in the environment they have chosen, either by birth or moving without large corporate companies believing that they have the right to destroy the environment with little thought or any truthfull research into what they are planning, apart from what they will gain at the huge expense to humans and nature, which I might add does a far better job at healing this earth than man ever has, and it doesn't cost anything. Unfortunately there lies the problem, it costs nothing, this proposal will.

Regards

Mrs Christina McGee

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: 97F67CA5

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, which highlight significant deficiencies across planning, environmental, cultural, and procedural dimensions. The wind farm is planned off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The design, proximity, and overall scale of the proposal raise critical questions about its compliance with statutory obligations, national policy frameworks, and the core principles of sustainable development.

A fundamental issue with the application is the inadequate evidential basis for reaching a lawful determination. Important environmental data is absent, baseline information appears limited and inconsistent, and several key elements of the proposal remain vague. The flexible design framework employed complicates an accurate assessment of potential significant effects. Furthermore, the documentation relies on unspecified mitigation measures, which hinders the ability to evaluate their effectiveness. Consequently, it does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leaving the claims of negligible or non-significant effects unsupported by solid evidence.

The proposal encounters notable policy conflicts. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and overall health and wellbeing. The application fails to prove that it meets national criteria aimed at protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies impact the statutory tests needed for consent and challenge the competent authority's ability to determine the proposal's acceptability in terms of policy.

Moreover, the unprecedented scale of the development in this area raises substantial concerns about its landscape capacity, visual impact, and environmental repercussions, especially with large turbines situated close to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is insufficient and unable to support a lawful determination. In light of these factors, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or trustworthy analysis of the potential environmental consequences of the proposed development. The application's use 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 undermines the credibility of the assessment, meaning that the impacts discussed may not accurately represent the final development, thus hindering both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Consent is being sought with a heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. This approach postpones the assessment of environmental harm to a later stage, which diminishes the opportunity for a meaningful evaluation of the effectiveness of those measures or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigations be clearly identified before determination.

Additionally, the report presents considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where assertions of negligible or non-significant effects are made without strong supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are established.

In summary, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and rigorous evaluation of environmental effects and indicate that the competent authority cannot make a decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposal fails to provide a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. In particular, there is no indication that the developer has thoroughly considered placing turbines further offshore, where impacts on visual aesthetics, ecology, and coastal areas would likely

be diminished. The sensitivity of the West Lewis coastline, along with the significant role that proximity to shore plays in determining environmental impact, underscores the importance of this analysis. Its absence raises doubts about whether the proposed siting is indeed the least damaging option available.

Moreover, the assessment of alternatives is materially inadequate and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives grounded in environmental effects, the application merely recounts the evolution of the project. This narrative fails to prove that less harmful options have been properly identified and assessed in preference to more damaging solutions.

Deficiencies are also evident in the evaluation of cable routing and landfall assessment. There is inadequate evidence demonstrating that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been applied; rather, reliance has been placed on post-design mitigation measures.

Consequently, the application does not show 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 prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, one cannot conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This marine environment is both highly sensitive and biologically active, yet the baseline data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

Particularly concerning is the omission regarding otters, classified as a European Protected Species. The application inadequately acknowledges their active use of the coastal regions for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts stemming from

construction-related disturbances, noise, and increased human activity have not been thoroughly assessed, undermining claims of no significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, as it relies heavily on aerial surveys, which introduce substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate they frequently utilise these waters. The oversight of relevant data leaves the baseline incomplete and further weakens the credibility of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on unsubstantiated assumptions rather than sound evidence. Additionally, the lack of comprehensive baseline data hampers meaningful evaluations of cumulative and indirect impacts, failing to account for seasonal variations and broader ecosystem interactions. This situation results in uncertainty regarding the actual risks faced by marine species and habitats.

Regulatory obligations are also not met, as the application does not adequately identify or assess protected species, failing to satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created prevents the assurance of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, culminating in the assertion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment pertaining to the proposed development is fundamentally unreliable, featuring significant internal inconsistencies and gaps in evidence that severely undermine its conclusions. This development is situated in critical foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected, failing to meet the evidential standard required for such assertions.

Moreover, there exists a stark contradiction within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency calls into question the trustworthiness of the assessment, highlighting that the conclusions drawn are not substantiated by the available evidence. The assessment fails to provide robust proof that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will not suffer negative impacts. The critical nature of these feeding grounds has not been

thoroughly addressed, and the reliance on modelling approaches creates uncertainty, particularly for species that are facing severe declines, such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate potential mortality, especially in contexts where baseline data is lacking and the behavioural responses of species are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively establishing a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential effects on species with limited global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle and obstructs a lawful conclusion supporting consent.

Additionally, the deficiencies observed illustrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements essential 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 transparency surrounding the Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing associated with the development proposal. While the developer conducted a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a significant evidential gap that hampers both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts, derived from direct community engagement, highlight the pressing social issues at play. However, without access to the complete assessment, there is limited capacity for scrutiny, which in turn restricts the ability to understand the significance of these findings in the context of decision-making.

Furthermore, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, these impacts have not been adequately addressed within the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the actual human and social costs associated with the development.

The absence of a complete understanding of the social, economic, and health impacts is particularly concerning for a development of this magnitude, where community

character and functionality may be at risk. The incomplete data set compromises the application's ability to present a full evidential basis for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not sufficiently demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should contribute to positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Thus, without the full assessment, compliance with this policy cannot be substantiated.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming in 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 current adverse impacts, renders the assessment incomplete and unreliable, preventing a lawful determination and reinforcing the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is inadequate and does not accurately portray the scale of change or the sensitivity of the environment. The coastline of West Lewis, characterised by its expansive Atlantic horizon and undeveloped landscape, embodies a profound sense of remoteness. The proposed installation of large turbines near the shoreline would impose a dominant industrial presence that would irreversibly alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not sufficiently convey the extent of this visual change. The size and closeness of the turbines would overwhelm views from residential areas, historic sites, and popular coastal locations, thus diminishing visual amenity and compromising the inherent qualities of naturalness and remoteness. The assessment inadequately reflects this impact and overlooks its significance within such a delicate landscape.

Concerns also arise regarding the selection of visual viewpoints, which may not fully encompass the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This suggests a potential understatement of the visual impact, calling into question the reliability of the assessment itself.

Additionally, there is a lack of analysis concerning the interconnectedness of the landscape, seascape, and cultural heritage. Heritage sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by

visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This results in not just a visual impact, but a deeper cultural and spatial harm that the application fails to adequately consider.

From a policy standpoint, this proposal contradicts National Planning Framework 4 concerning the safeguarding of natural spaces and historic assets. The magnitude of change is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation, reinforcing the conclusion that the proposal is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The assessment of construction and pollution risks associated with the proposal is incomplete, failing to provide the detail necessary for evaluating the likely environmental effects. There is a significant reliance on undefined future measures for mitigation and contingency, which are intended to be developed post-consent. This approach raises substantial concerns regarding the sensitivity of the receiving environment, as it prevents any meaningful assessment of the adequacy or effectiveness of these measures.

The proposal entails considerable 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 submitted with the application. Although the application acknowledges risks, such as sediment mobilisation and the potential for accidental chemical or oil spills, it lacks sufficient detail on preventative, control, or monitoring strategies. Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation, which necessitates robust modelling and clearly defined management strategies to ascertain the extent, duration, and ecological implications of such impacts.

The absence of detailed emergency response procedures exacerbates these issues. By postponing the development of contingency planning until after consent, the application limits the ability to evaluate whether appropriate safeguards are in place to respond effectively to pollution events. This approach introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferment of critical environmental safeguards conflicts with the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be evaluated prior to consent, and the absence of essential information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not convincingly demonstrate that these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that there are alternative fishing grounds that are available, accessible, or capable of accommodating additional pressures. This is a notable omission, as displacement could lead to overfishing in other areas, which may have far-reaching economic consequences for the local fishing fleet. Without a clear, evidence-based assessment, it remains difficult to grasp the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction activities. The high-energy hammer piling over an extended duration is likely to disturb marine life across considerable distances, affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application underplays these impacts without sufficient supporting evidence.

There is a noticeable inconsistency in the application regarding the need for licences to authorise harm to European Protected Species. While this need is recognised, the impacts are concurrently described as negligible. Such contradictions undermine the

credibility of the assessment and raise questions about compliance with the Habitats Regulations, especially in instances where harm may necessitate legal authorisation.

Moreover, the assessment does not adequately address cumulative impacts arising 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 fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies related to the lack of evidence on fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely interconnected; however, they are evaluated separately, resulting in a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements involve significant interventions, including cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities entail excavation through areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By 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 in unison; yet, the disconnection between offshore and onshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately addressed.

There are significant risks to sensitive habitats such as machair systems and peatland environments, which are under policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures are in place, leaving an evidential gap regarding biodiversity protection.

Furthermore, the proposal raises serious concerns about carbon balance. The disturbance of peatland could release stored carbon, potentially resulting in a carbon debt that counters the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence in the application to show that the required consents or processes have been initiated, prompting questions about the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal's failure to assess the impact of artificial lighting on nocturnal wildlife and dark skies represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. However, the introduction of permanent red aviation lighting will create a continuous and intrusive effect across the western horizon, fundamentally altering the night-time environment and the visual amenity enjoyed by both residents and visitors.

Moreover, there is no evaluation of how this lighting may impact species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are sensitive to artificial lighting. These species can experience disorientation and increased collision risk due to phototaxis. The lack of a lighting impact assessment or phototaxis study fails to address these crucial ecological concerns. Additionally, the reliance on daytime survey data in the ornithological assessment does not account for nocturnal activities, leaving vulnerable species like Kittiwakes at risk from artificial lighting during their foraging or migration at night.

Without thorough assessments of nocturnal impacts, it remains unclear whether protected species or designated sites may suffer adverse effects. The evidential standard required to rule out negative impacts beyond reasonable scientific doubt is not met, invoking the precautionary principle and impeding a lawful determination. From a policy perspective, this omission is inconsistent with the National Planning

Framework 4 regarding the protection of natural places and environmental quality, undermining the overall assessment of landscape and seascape impacts.

In summary, the lack of baseline data, impact modelling, and species-specific analysis regarding dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination. This significant evidential gap must be addressed to ensure a comprehensive understanding of the potential consequences.

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 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 believe that going ahead with this project will have a great detrimental effect on our islands.

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: C1305EFB

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies related to 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 significant cultural identity. Concerns about the scale, proximity, and design of the proposal raise questions regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

A significant issue with the application is the lack of a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many key aspects of the proposal remain undefined. The flexible design framework employed hinders a comprehensive understanding of the likely significant effects, and the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to furnish a complete or informed understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack solid evidence.

Furthermore, there are 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 does not demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts are critical as they directly relate to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development complies with policy.

The scale of the proposal is unprecedented for this location, with large turbines planned to be installed in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot support 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 presents significant deficiencies that compromise its reliability and transparency concerning the environmental effects of the proposal. A flexible Project Design Envelope is utilised, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces a level of uncertainty that undermines the integrity of the assessment, resulting in impacts that may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a true understanding of the potential environmental consequences.

Furthermore, the application is heavily reliant on mitigation measures and management plans that have yet to be defined. Seeking consent under these conditions means that potential environmental harm is deferred for later consideration, which hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This approach is procedurally unacceptable, as it conflicts with the purpose of the Environmental Impact Assessment regime that necessitates clear establishment of likely significant effects and mitigation prior to determination.

Significant evidential gaps also exist, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal further fails to demonstrate adherence to National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and gaps in baseline data culminates in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the

project's evolution. This narrative does not demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to present a thorough assessment of marine ecology and protected species, resulting in a lack of a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is noted for its high sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened

activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

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

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on local wildlife, particularly on the internationally important seabird populations along the west coast of the Isle of Lewis. These populations, many of which are already in decline, are critical to the area's biodiversity. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The site is situated within vital foraging areas and migratory pathways, yet the assessment provided does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There exists a critical contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also putting forth a case for Habitats Regulations derogation, which is typically invoked in situations where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not backed by sufficient evidence. Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. The importance of their feeding grounds is insufficiently addressed, and reliance on modelling methodologies introduces uncertainty, particularly concerning species that are already in severe decline, like Kittiwakes and Fulmars.

The proposed siting of turbines within a recognised migratory corridor adds another layer of risk, potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not effectively evaluate the long-term consequences of ongoing mortality in 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 needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent.

The deficiencies noted also signify non-compliance with the National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that the development will not adversely impact internationally important seabird populations places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under consideration presents significant deficiencies in its assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features. This mischaracterisation neglects their continued use and significance, as well as the potential impact of development on their setting. Consequently, this results in an incomplete evaluation of cultural effects and overlooks their essential role in community life.

Furthermore, the application neglects to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between

the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a significant oversight. The lack of consideration for these factors impedes a proper understanding of the cultural impact of the development.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. This absence of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation concerning cultural and environmental interests.

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

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

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is concerning and significantly undermines the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge the full extent of the social risks that have been identified.

Available summaries suggest 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 and are therefore grounded in reality, not conjecture. The absence of the complete assessment limits scrutiny of these findings and restricts the ability to understand their implications for decision-making.

Furthermore, there are indications that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings.

Nonetheless, these significant impacts have not been adequately incorporated into the main application or given the appropriate consideration they deserve. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of comprehensive information also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, particularly when community character and functionality are at stake. Without the complete dataset, the application lacks a full evidential basis necessary for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that remain undisclosed. In light of the incomplete assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The application for large-scale turbines in close proximity to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not sufficiently represent the scale of change or the sensitivity of the receiving environment.

There are significant concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

The application also fails to examine the interconnected relationships between

landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these sites as isolated entities without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

Furthermore, the industrialisation of the seascape would disrupt these relationships and alter the context in which heritage assets are experienced. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy perspective, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. The absence of a robust worst-case assessment further weakens the claim of compliance with policy requirements.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making any change fundamentally permanent rather than reducible to an acceptable level through mitigation. Collectively, these deficiencies highlight the failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

Moreover, there is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty also

encompasses potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The evaluation of the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal aligns with sustainable development.

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant deficiencies in the assessment of onshore infrastructure, which is essential to understanding the entire project's impacts. The offshore turbines and onshore works are interconnected; however, they are evaluated in isolation. This fragmented assessment obscures the complete picture of both environmental and socio-economic effects.

Onshore activities include installing cabling across protected moorland and constructing a substation near Stornoway. These developments require access infrastructure through sensitive landscapes and involve excavation in areas of deep peat, especially within Barvas Moor, a crucial carbon store and ecologically delicate habitat. The lack of a thorough assessment regarding these impacts limits the understanding of the project's overall environmental footprint.

By deferring the evaluation of onshore impacts, the application hinders a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components must be considered collectively. The division between offshore and onshore aspects prevents a complete understanding of the combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland areas, which are protected by policy. The proposal fails to show that these habitats

have been fully assessed, or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Moreover, the project raises issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The proposal does not satisfactorily address this concern or prove that the overall carbon balance is advantageous.

Routing infrastructure through active croft land may also conflict with established land use and legal rights. The application lacks evidence that necessary consents have been obtained or that proper processes are underway, thus calling into question the feasibility and legality of the implementation.

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

In summary, the separation of project components, the absence of comprehensive assessments, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, preventing 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 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 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

Who wants this project to go ahead? Not the locals living on the West Side of Lewis.

This is being imposed on them against their will. No democracy here.

This monstrosity will destroy the views over the Ocean from the West Side of Lewis. The lights will dazzle drivers travelling from Stornoway to Barvas across the the Barvas Moor. Dark skies, what dark skies?

If given the go ahead this industrialisation will destroy all that makes the West Side of Lewis special.

If approved, N4 could have up to 60 wind turbines up to a height of 338 metres above Mean Sea Level (that's taller than the Eiffel Tower and nearly three times higher than the meteorological mast they installed on the Barvas machair). That industrialisation of the landscape wouldn't be tolerated or allowed in Urban Britain so why should it be tolerated in Lewis?

The closest turbine would be only 6km from shore - dominating populated areas of

incredible beauty, cultural significance and historic importance. The effects on the environment and marine life would be devastating, not to mention the effects on people living in our communities.

Here are some of the reasons why i believe this project should not go ahead:

- N4 conflicts with the Development Plan and NPF4
- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life
- N4 harms humans living in close proximity
- N4 harms visual amenity
- N4 conflicts with and threatens tourism
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites
- N4 causes cumulative long-term harm
- N4 conflicts with biodiversity policy
- N4 threatens community identity, tradition, and distinct character of the West Side.

Enough is enough, say no to allowing this scheme to go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 25624FB4

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 regulations. Upon reviewing the Environmental Impact Assessment Report and associated documentation, significant deficiencies have been identified regarding material planning, environmental, cultural, and procedural matters. 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 heritage. The scale, design, and proximity of the wind farm raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and many key aspects of the project remain undefined. The flexible design framework employed does not allow for a clear understanding of the likely significant effects, while the proposed mitigation measures, which are not specified, hinder the ability to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

There are evident and serious conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's capacity to determine the proposal's acceptability in policy terms.

The proposal's scale is unprecedented for this location, with large turbines planned in close proximity to the shoreline, leading to significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance 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 suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental impacts, the application merely outlines the project's development narrative. This

methodology does not sufficiently demonstrate that less harmful alternatives have been identified, assessed, and chosen over more damaging options.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the crucial nature of proximity to shore in assessing impact, the absence of such analysis impedes any conclusion that the proposed site is the least damaging.

These inadequacies also extend to the cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates a failure to implement mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, inhibiting the competent authority from determining whether more appropriate, less harmful 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 deficiency compromises 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 adds to the conclusion that the application has not been sufficiently evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, lacking a complete understanding of the ecological receptors present within the West Lewis coastal environment. This region is recognised for its biological activity and sensitivity; however, the baseline data remains incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to establish a reliable evidential basis for evaluating potential impacts.

A significant oversight is the treatment of otters, classified as a European Protected Species. The application neglects to adequately identify and assess their use of coastal regions for foraging and movement. By failing to take into account their core foraging range and behavioural habits, the assessment inadequately evaluates the potential effects of construction disturbance, noise, and increased activity on these animals.

This shortfall undermines the conclusions drawn regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks demonstrates further shortcomings, particularly due to an overreliance on aerial surveys that introduce a considerable detection bias, especially under Atlantic conditions. This method likely underestimates the presence of basking sharks when compared to established land-based observations that indicate their frequent use of the area. The omission of this relevant data results in a deficient baseline, thereby compromising the reliability of the conclusions reached.

These methodological flaws lead to conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species, ultimately illustrating that the application does not rest on a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps in evidence and internal inconsistencies, rendering its conclusions unreliable. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the proposed development, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. The assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these

feeding grounds has not been thoroughly considered, and the reliance on modelling approaches adds uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor introduces additional risks, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal directly at odds with national policy.

In summary, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking and does not acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply intertwined. The application takes a narrow view, treating heritage as disconnected, unchanging assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is how culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are handled. These sites serve as active burial places and spiritual locations, yet the assessment treats them as fixed features, overlooking their current use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete assessment of cultural effects and fails to acknowledge their importance in community life.

The assessment also neglects to consider intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are crucial to the

area's identity but are entirely omitted from the evaluation, representing a major gap. Without addressing these factors, the true cultural impact of the development cannot be adequately grasped.

There are additional concerns regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles of involvement in decisions that affect cultural and environmental matters.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This absence alone makes lawful determination impossible.

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

In summary, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application fails to provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts is inadequate and lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the complete report has not been made available. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to gauge the full range of social risks identified by the developer's own research.

Residents have reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative in nature. However, the non-disclosure of the full assessment limits proper scrutiny of these findings, affecting the ability to assess their significance in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Yet, these impacts have not been adequately reflected in the main application or given the necessary consideration. The absence of the full Social Impact Assessment clouds the actual human and social costs

associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this magnitude, especially when community character may be at risk. The failure to provide the full dataset means the application does not offer a complete evidential basis for evaluating the balance between benefits and harms.

From a policy viewpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the current evidence reveals existing negative effects that have not been fully disclosed. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural consequences are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

Overall, the failure to disclose the complete Social Impact Assessment, in conjunction with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and underscores 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, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would create a dominant industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not adequately reflect the magnitude of this change or the sensitivity of the receiving environment.

The application fails to fully represent how visual amenity would be impacted. The scale and proximity of the turbines mean that they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This oversight erodes the defining qualities of naturalness and remoteness in the area. Furthermore, the methodology employed in selecting and presenting visual viewpoints raises significant concerns. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This may lead to an understatement of the visual impact, undermining the reliability of the assessment.

Another critical deficiency is the lack of assessment regarding the interconnectedness of landscape, seascape, and cultural heritage. Sites like 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 sites as isolated, ignoring their interdependence, which results in an incomplete understanding of the impacts on their cultural significance and setting. The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural areas and historic assets. The scale of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further jeopardises claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation. In conclusion, the assessment does not accurately depict the scale of impact, the environment's sensitivity, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

There exists uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to

potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent prevents the evaluation of whether adequate safeguards will be in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be assessed prior to granting consent. In cases where this information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the assessment provided in the application is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. It does not establish that these vital habitats and uses can be safeguarded or sustained without significant disruption.

A critical flaw in the application lies in its assumption that fishing activities can be relocated without adverse consequences. There is no evidence presented that alternative fishing grounds exist, are accessible, or can support additional pressures. This significant omission raises concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to disturb marine life over extensive distances, notably affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population warrants serious concern, yet the application downplays these effects without adequate supporting evidence.

There is an evident inconsistency in the application, as it acknowledges the necessity of licences for permitting harm to European Protected Species while simultaneously

characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises significant questions regarding adherence to the Habitats Regulations, especially given the predicted level of harm that requires legal authorisation.

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

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

In summary, the shortcomings regarding evidence on fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies contribute to an assessment that is incomplete and unreliable. These deficiencies impede a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that benefit from policy protection. The lack of a thorough assessment of impacts on these habitats raises concerns about biodiversity protection and demonstrates a clear evidential gap. Additionally, the disturbance of peatland resulting from the project could lead to a release of stored carbon, potentially creating a carbon debt that contradicts the renewable energy objectives. The application does not adequately tackle this issue or show that the overall carbon balance will remain beneficial.

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

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

From a policy perspective, the failure to assess the project as a cohesive whole and to demonstrate protection for peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the credibility of the application. Taken together, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play an essential role in shaping the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This development does not assess the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the significance of dark skies to the local identity and the growing astro-tourism sector.

Furthermore, the application fails to evaluate the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting, which can disorient them and increase their collision risk. No lighting impact assessment or phototaxis study has been included, resulting in a lack of understanding of how aviation lighting may affect these species or contribute to increased mortality rates.

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

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

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

undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the ecosystem.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Given the reliance of tourism on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness, this oversight is particularly concerning. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the proposal does not model the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality for tourism, especially the value of unspoiled landscapes and dark skies to visitor experiences, including growing markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this gap, leaving a considerable lack of understanding regarding impacts on an acknowledged and burgeoning segment of the local economy.

In the context of a community on an island with limited economic diversification, the lack of assessment regarding tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated as mandated under 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 requirement to show a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to supply sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the

environmental factors driving visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This ultimately hinders a robust assessment of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development when evaluated against statutory obligations, national policy, and evidential requirements. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in many areas.

A complete and reliable evidential basis for determination is absent, revealing critical gaps in baseline data. The continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of important impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects contribute to an incomplete Environmental Impact Assessment. This deficiency hinders a comprehensive understanding of potential significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, nor does it adequately address health and wellbeing impacts. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. Inadequate assessment of the cumulative impact of both offshore and onshore elements obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, along with inconsistencies within the data, fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns that engage the precautionary principle and prevent a lawful determination regarding the acceptability of impacts.

The proposal would lead to substantial and irreversible changes to a landscape that is

highly sensitive. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and negative impacts on tourism would result in permanent changes that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The numerous deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. Therefore, the competent authority is urged to either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I feel any energy generated should benefit the local community.
I am concerned about the environmental impact due to building infrastructure for the project, the lifespan of the windmills and how they are going to be recycled.

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: 4CA4D38B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under relevant marine licensing and Environmental Impact Assessment regimes. The proposal raises significant concerns due to its unprecedented scale, with large turbines to be placed in close proximity to the shoreline, which will have implications for landscape capacity, visual dominance, and overall environmental impact. This development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

A comprehensive review of the Environmental Impact Assessment Report and associated documentation has revealed numerous material planning, environmental, cultural, and procedural deficiencies. The application lacks an adequate evidential basis necessary for a lawful determination. Critical environmental data is missing, and the baseline information provided is limited and inconsistent, with many key aspects of the proposal remaining undefined. The adoption of a flexible design framework complicates understanding the likely significant effects of the development, while the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a full or informed understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by robust evidence.

Moreover, there are clear and substantive conflicts with existing policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and weaken the capacity of the competent authority to determine the development as acceptable in policy terms.

The absence of adequate information, combined with a reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, illustrates that the application is incomplete and unable to support a lawful determination. In light of these concerns, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a complete, transparent, or dependable account of the expected environmental

consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty impedes the application of a worst-case scenario assessment, thus compromising the integrity of the evaluation. Consequently, the impacts illustrated may not correspond to the development that is ultimately realised, hindering both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application significantly relies on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach requests consent under the premise that environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of effectiveness or understanding of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigation be clearly identified before a determination is made.

There are critical evidential shortcomings, including deficiencies in baseline data, constraints in methodology, and dependence on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are posited without robust supporting evidence. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on environmental effects, it provides a narrative that lacks substance. This approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a notable absence of a transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Crucially, the application does not show that the developer has thoroughly considered the option of placing turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely be greater. The West Lewis coastline is sensitive, and the importance of proximity to shore in assessing impact cannot be overstated. The lack of this analysis undermines any assertion that the proposed siting represents the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, with insufficient evidence to suggest 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 failure to provide a clear avoidance strategy and comparative analysis reflects a lack of application of mitigation by design, relying instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been effectively minimised through the selection of the site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these shortcomings jeopardise compliance with National Planning Framework 4, particularly concerning the protection of 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 has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in its assessment of marine ecology and protected species, leading to an inadequate understanding of ecological receptors within the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity. However, 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 sound evidential basis for evaluating potential impacts.

A notable gap in the assessment pertains to otters, a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been properly assessed, thereby undermining

conclusions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed, with a reliance on aerial surveys leading to significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent use of these waters. By not incorporating or appropriately considering such data, the assessment presents an incomplete baseline, diminishing the reliability of the conclusions.

The methodological limitations highlighted imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. Without sufficient baseline data, meaningful assessments of cumulative and indirect impacts are not achievable, which includes consideration of seasonal variations and wider ecosystem interactions. This uncertainty raises questions about the true scale of risk 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 National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent 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 impacts on marine ecology and protected species and lead to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by evidence gaps and contradictions that undermine its validity. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be adversely impacted. The development site lies within critical foraging areas and migratory routes, yet the assessment fails to thoroughly evaluate the potential consequences of displacement, collision risk, and habitat loss.

There exists a notable contradiction in the application, as the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency casts doubt on the assessment's credibility and suggests that its conclusions lack support from the underlying data. Furthermore, the assessment inadequately demonstrates that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding

grounds is not fully recognised, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are already in decline. The methodologies employed are likely to underreport mortality, especially where baseline data is lacking and behavioural responses are not completely understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term impacts of continued mortality in this corridor or the effects on species with relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and local traditions, along with the enduring connection between the community and the coastal environment. These aspects are vital to the region's identity but are entirely omitted from the analysis, representing a substantial gap. The absence of these considerations means that the cultural implications of the development cannot be fully comprehended.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified by the developer.

Summaries suggest that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct community engagement, not speculation. However, without access to the complete assessment, proper scrutiny of the findings is not possible, which limits the assessment of their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the

impacts have not been adequately included in the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be affected. By not providing the complete dataset, the application lacks a solid evidential basis to weigh the benefits against potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet existing adverse effects indicated by available evidence have not been fully disclosed. Consequently, without the full assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a comprehensive 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 set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This hinders a lawful determination and underlines the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would profoundly alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately depict the magnitude of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential properties, historic landmarks, and popular coastal areas. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence to suggest that the viewpoints chosen may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning

important cultural heritage sites and high-value landscapes. This could lead to an underestimation of the visual impacts, thus compromising the reliability of the assessment.

Another major shortcoming is the lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete understanding 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 goes beyond a mere visual impact, representing a more extensive cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in terms of safeguarding natural environments and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant locations. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The size, height, and proximity of the turbines would create a dominant and unavoidable presence. Consequently, the resulting transformation is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The lack of defined mitigation measures and detailed management plans significantly hampers the assessment of construction and pollution risks associated with this proposal. There is a serious deficiency in the information provided to evaluate the likely environmental effects, particularly given the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination, yet the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans.

Although the application acknowledges potential risks, such as sediment mobilisation

and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored. This absence of clear strategies leaves a troubling uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and management strategies in place, it is impossible to ascertain the extent, duration, or ecological implications of these impacts on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent has been granted, the application denies proper evaluation of whether sufficient safeguards are established to address potential pollution events. This approach not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring crucial environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and appropriate mitigation must be evaluated before consent is issued, and the absence of this information means a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the failure to provide a robust assessment of construction and pollution risks, combined with the lack of clarity on potential impacts, renders the assessment materially deficient and supports the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of fisheries and marine life, failing to provide a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these crucial habitats and uses, which raises serious concerns regarding potential disruptions.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. There is a lack of evidence within the application regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate this displacement. This crucial omission poses risks of overfishing in other areas, which may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and livelihoods.

Moreover, the proposal poses considerable risks to marine species, notably through the underwater noise associated with construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that may affect marine life over large distances, particularly species such as dolphins.

The potential disruption to a significant portion of the local bottlenose dolphin population raises pressing concerns. Nevertheless, the application appears to minimise the significance of these impacts without providing sufficient supporting evidence.

There exists a contradiction within the application itself, where the necessity of licences to permit harm to European Protected Species is acknowledged, yet impacts are concurrently characterised as negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm is of a nature that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these cumulative effects obscures the overall impact on marine ecosystems and socio-economic conditions, hindering a proper understanding of the implications involved.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby undermining any assertion that it constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project as a whole is fundamentally flawed, as it fails to provide a complete evaluation of the impacts associated with what constitutes a single integrated endeavour. The distinct treatment of offshore turbines and onshore works results in a fragmented analysis that obscures the true scope of the environmental and socio-economic consequences.

The onshore infrastructure comprises various elements, including cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access routes through delicate landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which is recognised as both an ecologically sensitive habitat and a critical carbon store. The application does not offer a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Furthermore, the separation of assessments for offshore and onshore components leads to a failure to evaluate cumulative effects adequately. The Environmental Impact

Assessment process mandates that all parts of a project be examined collectively. However, the disjointed assessment obscures the combined effects on peatlands, habitats, and local communities, leaving significant risks unaddressed.

There are substantial threats to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application lacks sufficient evidence that impacts on these habitats have been fully evaluated or that effective avoidance measures have been implemented, which raises a clear evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland areas can release stored carbon, leading to a potential carbon debt that contradicts the aims of renewable energy initiatives. The application fails to tackle this issue adequately or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of the infrastructure through active croft land introduces risks of conflict with existing land uses and legal entitlements. There is no evidence provided that the necessary consents or processes have been initiated, which raises concerns about the project's deliverability and lawful execution.

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

In summary, the separation of the project's components, the lack of a comprehensive impact assessment, and insufficient evidence concerning environmental and land use implications collectively render this aspect of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in shaping environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting that is visible over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The application does not assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, representing a significant omission given the importance of dark skies to the area's identity and the growing sector of astro-tourism.

Equally concerning is the complete lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can result in disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study fails to evaluate how this aviation lighting could

adversely affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, also face vulnerability from artificial lighting, yet this risk has not been addressed. Without site-specific night-time data, a critical gap in understanding ecological impacts remains.

The failure to assess nocturnal impacts makes it impossible to determine whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which aims to protect natural places and ensure environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as night-time character is an essential component of the environment.

In conclusion, the absence of any assessment concerning dark skies and nocturnal wildlife leads to 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 evaluation of tourism impacts within the application is significantly inadequate, neglecting to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The area's tourism thrives on its wild coastline, almost untouched landscapes, dark skies, and the feeling of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions made by tourism.

Tourism in the region has experienced notable growth, escalating from £65 million in 2017 to over £81.5 million, which sustains more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not explore how the anticipated industrialisation of the seascape and degradation of environmental quality might affect the Tourism Gross Value Added or the resilience of the broader economy. Without this critical assessment, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the analysis does not adequately address the significance of environmental quality for tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and burgeoning markets like nature-based tourism

and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a notable absence in understanding its effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader consequences for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefits. It is at odds with strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminates in a substantial evidential gap. This gap hinders a thorough assessment of economic implications and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards for sustainable development as mandated by statutory duties, national policy, and evidential benchmarks. This application mirrors the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is now being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential foundation necessary for a proper determination is incomplete and unreliable. Notable gaps exist in the baseline data, and the application relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. This results in an incomplete Environmental Impact Assessment, which fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal is in clear conflict with National Planning Framework 4. It does not

demonstrate the protection of biodiversity, natural spaces, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with policy conflicts and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate regulatory provisions to demand the submission of the missing information.

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

Additional Comments

We are a camping pod company who heavily rely on tourism and believe that this project will have a severe detrimental effect on our business. One of the main reasons that guests come to Callanish is for the Standing Stones and the dark nights and should this project go ahead they will not be able to have this experience any more. This reason, added to all the other reasons ticked, should surely be taken into account.

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: 642803C2

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, which highlight significant deficiencies across planning, environmental, cultural, and procedural dimensions. The wind farm is planned off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The design, proximity, and overall scale of the proposal raise critical questions about its compliance with statutory obligations, national policy frameworks, and the core principles of sustainable development.

A fundamental issue with the application is the inadequate evidential basis for reaching a lawful determination. Important environmental data is absent, baseline information appears limited and inconsistent, and several key elements of the proposal remain vague. The flexible design framework employed complicates an accurate assessment of potential significant effects. Furthermore, the documentation relies on unspecified mitigation measures, which hinders the ability to evaluate their effectiveness. Consequently, it does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leaving the claims of negligible or non-significant effects unsupported by solid evidence.

The proposal encounters notable policy conflicts. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and overall health and wellbeing. The application fails to prove that it meets national criteria aimed at protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies impact the statutory tests needed for consent and challenge the competent authority's ability to determine the proposal's acceptability in terms of policy.

Moreover, the unprecedented scale of the development in this area raises substantial concerns about its landscape capacity, visual impact, and environmental repercussions, especially with large turbines situated close to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is insufficient and unable to support a lawful determination. In light of these factors, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the Environmental Impact Assessment. As a result, the projected impacts may not accurately represent the actual development, which obstructs both public understanding and the competent authority's ability to assess the true environmental effects.

Moreover, the proposal places considerable emphasis on undefined mitigation measures, monitoring strategies, and management plans. This deferral of essential information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime. The regime mandates that likely significant effects and their mitigation be established clearly before determination, and this proposal fails to meet that requirement.

The assessment also suffers from substantial evidential deficiencies, including gaps in baseline data and methodological limitations, leading to the use of assumptions instead of site-specific evidence. This creates uncertainty surrounding the scale and significance of impacts, especially where conclusions about negligible or non-significant effects are drawn without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt, invoking the precautionary principle particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Taken together, these factors—an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data—render the Environmental Impact Assessment Report both unreliable and incomplete. Such deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured comparison of realistic alternatives based on their environmental effects and instead provides a narrative of the project's evolution. This approach does not show that less harmful options have been properly identified or assessed in preference to more damaging ones.

There is no evidence-based comparison of alternative offshore locations, development scales, or design configurations. The application does not demonstrate that the developer considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in determining impact, the lack of such analysis undermines any conclusion that the proposed siting is the least damaging option.

The issues also extend to cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been applied, leading to reliance on post-design mitigation measures instead.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

The evaluation of basking sharks also presents significant deficiencies, as the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic

conditions. This method likely underestimates the presence of these sharks, especially when compared to established land-based observations that demonstrate their frequent utilisation of these waters. The lack of incorporation of such data contributes to an incomplete baseline, further undermining the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment related to the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. The development is situated within key foraging areas and migratory pathways, yet the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss for these species.

A key contradiction exists in the application, where the developer asserts no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is typically only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not underpinned by adequate evidence. Furthermore, the assessment does not sufficiently 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 methods introduces uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially given incomplete baseline data and the lack of understanding of

behavioural responses.

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

From a regulatory standpoint, the application fails to 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, combined with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby preventing a lawful conclusion in support of consent. Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal 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 comprehensive evaluation of impacts and collectively lead to the conclusion that the application does not satisfy the statutory requirements necessary 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 lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer's own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposed development lacks sufficient detail regarding the impacts on seascape, landscape, and visual elements, failing to appropriately address the extent of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence that fundamentally alters this character and leads to a permanent transformation of the landscape.

The application inadequately conveys the scale of the visual change that would occur. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly undermine visual amenity and diminish the naturalness and remoteness that define the area. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

There are notable methodological flaws concerning how visual viewpoints are selected and presented. Evidence indicates that these viewpoints may not fully account for the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This raises the risk that the assessment

has understated the magnitude of visual impacts, thus compromising its reliability.

Another significant shortcoming is the failure to consider the interconnected nature of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked to the broader landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated rather than recognising their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contravenes the principles outlined in National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated changes are inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further calls into question any claims of adherence to policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Therefore, the resulting changes are fundamental and permanent, not amenable to reduction through mitigation efforts.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and heritage. These deficiencies hinder a reliable evaluation and strongly suggest that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment

mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is also ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly outlined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is applicable to potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Moreover, the deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether adequate safeguards are established to respond to pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in the assessment of fisheries and marine life, failing to offer a thorough evaluation of the ecological and socio-economic impacts on the waters off the West Lewis coast. This area supports a vibrant marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without facing substantial disruption.

A critical concern is the flawed assumption that fishing activities can be easily displaced without any repercussions. The application lacks evidence to suggest that alternative fishing grounds are available or capable of accommodating additional pressure. This significant omission 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 the livelihoods of those dependent on them remain poorly understood.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over vast distances, adversely affecting species such as dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population is alarming; however, the application minimises these effects without providing sufficient supporting evidence.

The application reveals an inconsistency regarding the necessity for licences to permit harm to European Protected Species while simultaneously describing those impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and displacement of fishing activities. The failure to comprehensively evaluate these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the proposal's sustainability.

Overall, the lack of evidence related to fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and unreliable. These shortcomings obstruct a proper evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning the onshore infrastructure is significantly incomplete and neglects to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are closely interconnected with the onshore works, yet they are assessed in isolation, leading to a disjointed approach that conceals the true extent of environmental and socio-economic repercussions.

The onshore aspects of the project include cabling that crosses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes. Notably, this work involves excavation across deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's overall environmental footprint.

Excluding or postponing the assessment of onshore impacts restricts a proper

evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively; however, the differentiation between offshore and onshore elements leads to a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to delicate habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate 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 lacks evidence that the necessary consents or processes have been undertaken, casting doubt on the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is notably lacking in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, a crucial aspect of both environmental quality and cultural identity, as well as an important factor for tourism. The proposed installation of permanent red aviation lighting would create a continuous "wall of light" effect that could be seen from long distances, fundamentally changing the night-time landscape.

Furthermore, there is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the area's reliance on dark skies, which is vital for the growth of emerging tourism sectors, including astro-tourism. Consequently, this gap in the landscape and environmental assessment is glaring.

The application also fails to address the potential impacts on nocturnal wildlife, such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly susceptible to artificial lighting. This susceptibility can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or a study on phototaxis, the proposal does not adequately consider how aviation lighting could affect these species or lead to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment is troubling, as it does not take into account nocturnal activity or the associated risks. Other species, such as Kittiwakes, may forage or migrate at night, yet their vulnerability to artificial lighting has not been evaluated. The lack of site-specific data regarding night-time activity creates a vital gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and calls into question the legality of the proposal.

From a policy standpoint, this lack of assessment contravenes National Planning Framework 4, which seeks to protect natural places and maintain environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, as the character of the night environment is a crucial component of the broader ecosystem.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and specific analyses of affected species makes the application incomplete and unsuitable for lawful determination.

TOURISM

The application for the proposed development presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences on a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are motivated 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 contributions of tourism.

Tourism in the area has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and currently supports more than 1,000 jobs, comprising up to 16% of the island's economy. Nevertheless, the application does not explore how the anticipated industrialisation of the seascape and a decline in environmental quality may affect Tourism Gross Value Added or broader economic resilience. This lack of

analysis inhibits the ability to ascertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the application fails to adequately consider the significance of environmental quality in fostering tourism. This includes the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the rising demand for nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the potential impacts on this recognised and growing segment of the local economy.

For an island community with limited economic diversification, the insufficient evaluation of tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

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

Collectively, these shortcomings—including the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependency of the island—culminate in a significant evidential gap. This gap hampers a thorough assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: EC2B5631

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts is insufficient and does not adequately capture the extent of change or the sensitivity of the local environment. The West Lewis

coastline is characterised by its open Atlantic horizon, a lack of development, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a continuous and overpowering industrial presence, significantly altering this character and resulting in a permanent and irreversible change to the landscape.

The application fails to properly convey the magnitude of the visual alteration. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the level of impact or its importance within the context of such a sensitive landscape.

There are significant concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, calling into question the reliability of the assessment.

Another critical shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context linked by visual and spatial connections to the Atlantic horizon. The assessment treats these as standalone entities instead of recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and disconnecting them from the natural horizon. This signifies not merely a visual impact but a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal stands in direct opposition to National Planning Framework 4, which concerns the protection of natural spaces and historic assets. The extent of change contradicts the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting change is thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment inadequately represents the magnitude of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage.

These shortcomings hinder a reliable evaluation and reinforce the argument that the proposal is incompatible with the protection of this landscape.

TOURISM

The evaluation of tourism impacts within the application is insufficient and neglects to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is stated that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions from tourism.

Tourism on the island has experienced notable growth, increasing from £65 million in 2017 to over £81.5 million, which supports over 1,000 jobs and represents approximately 16% of the island's economy. Nevertheless, the application does not explore how the industrialisation of the seascape and the resulting decline in environmental quality would affect the Tourism Gross Value Added or the broader economic resilience. Without this critical analysis, it remains unclear whether the development would provide a net economic benefit or adversely affect an established and thriving sector.

The assessment further neglects to examine the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, along with emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in understanding the effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the inadequate assessment of tourism impacts has broader consequences for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the necessity to show net benefits. It conflicts with strategic objectives that designate tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combined shortcomings of failing to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminate in a significant evidential gap. This impedes a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This application brings forth the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly highlighted. Now, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the determination of this application is neither complete nor reliable. It suffers from critical gaps in baseline data, the use of an undefined design envelope, an over-reliance on unspecified mitigation measures, and a failure to address key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, leaving significant effects and residual impacts inadequately understood.

Moreover, there are notable procedural failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the omission of a comprehensive Social Impact Assessment is a serious material shortcoming. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for a lawful determination.

In direct contradiction to National Planning Framework 4, the proposal fails to provide evidence of biodiversity protection, preservation of natural places, and safeguarding of cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring their 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 not only incomplete but also inconsistent in parts. The evidential threshold necessary to confidently exclude adverse effects has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

Taken as a whole, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with policy conflicts

and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke relevant regulatory provisions to demand the submission of the missing information.

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

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: D71DF838

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regimes. The proposal raises serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles. It is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks an adequate evidential basis for lawful determination, as it omits critical environmental data, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. This results in documentation that fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are also substantial policy conflicts to address. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this region, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and does not support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency concerning the environmental effects of the proposal. A flexible Project Design Envelope is utilised, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces a level of uncertainty that undermines the integrity of the assessment, resulting in impacts that may not accurately reflect the final development. Consequently, both the public and

the competent authority are left without a true understanding of the potential environmental consequences.

Furthermore, the application is heavily reliant on mitigation measures and management plans that have yet to be defined. Seeking consent under these conditions means that potential environmental harm is deferred for later consideration, which hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This approach is procedurally unacceptable, as it conflicts with the purpose of the Environmental Impact Assessment regime that necessitates clear establishment of likely significant effects and mitigation prior to determination.

Significant evidential gaps also exist, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal further fails to demonstrate adherence to National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and gaps in baseline data culminates in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application suffers from significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It presents a narrative account of project evolution rather than a structured and reasoned comparison of realistic alternatives based on their environmental impacts. This method does not adequately demonstrate that less harmful options have been appropriately identified, assessed, and chosen over more damaging solutions.

The lack of a transparent and evidence-based comparison extends to the evaluation of offshore locations, development scales, and design configurations. Notably, there is no indication that the developer has seriously contemplated placing turbines further

offshore, which could potentially reduce visual, ecological, and coastal impacts. The sensitive nature of the West Lewis coastline highlights the importance of proximity to shore in determining impact, and without such analysis, it is impossible to assert that the proposed siting is the least damaging option available.

Moreover, the deficiencies are evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The absence of a clear strategy to avoid impacts and the lack of comparative analysis suggest that the concept of mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, these deficiencies cast doubt on compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant gap that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant oversight is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are inadequately evaluated. This gap undermines any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals further deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially in comparison to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline

and further weakens the reliability of the conclusions presented.

These methodological limitations mean that any conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data impedes a meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions, creating uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory perspective, the application does not meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these conditions, 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 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 lacks reliability due to significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development risks displacement, collision, and habitat loss, yet these implications are not robustly evaluated.

A critical inconsistency arises within the application itself, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is applicable only when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and raises questions about the support provided by the underlying evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches leads to uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed likely underestimate mortality, especially given incomplete baseline data and an insufficient understanding of behavioural responses.

Siting turbines within a recognised migratory corridor introduces further risk by creating a barrier in a primary flight path used by species travelling 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 impacts on species with relatively

small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle, precluding a lawful conclusion in support of consent.

These deficiencies indicate 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 directly at odds with national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence prevent 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 West Lewis coastline is not merely a geographical area; it embodies a living cultural landscape where environment, language, tradition, and community interlink deeply. The assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a series of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community. This reductive approach fails to acknowledge the integral nature of these cultural elements.

A significant shortcoming is evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features. This oversight neglects their continuous use and meaning, resulting in an incomplete understanding of the cultural effects and disregarding their significance within community life.

The application also neglects to assess intangible cultural heritage, including the Gaelic language and traditions that form the foundation of community identity in the area. This omission is notable as these elements are vital to understanding the cultural impact of the development. Without their inclusion, the assessment remains deficient and fails to capture the true cultural cost of the proposed development.

Additionally, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised as having the characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, a significant procedural failure exists due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands

(Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy perspective, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sufficient basis for evaluating the genuine cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This deficiency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning could be compromised. The failure to provide the complete dataset means the application lacks a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote

positive health outcomes and mitigate harm, yet the evidence at hand points to existing adverse effects that remain inadequately addressed. Without the full assessment, it is impossible to establish compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, landscape, and seascape impacts lacks thoroughness and does not adequately account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The planned introduction of large turbines in close proximity to the coast would lead to a continuous and predominant industrial presence, fundamentally altering this character and effecting a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual change. The size and location of the turbines would overshadow views from residential properties, historical sites, and frequently visited coastal areas. Consequently, this would adversely affect visual amenity and diminish the inherent qualities of naturalness and remoteness. The assessment does not sufficiently articulate this impact or its importance within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the actual visual impact has been understated, thereby compromising the credibility of the assessment.

Additionally, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape framework that links them visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of 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 situation presents not merely a visual impact but also a broader cultural and spatial detriment that has not been adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The anticipated level of change contradicts the necessity to protect landscape character, visual amenity, and the context of culturally important sites. The lack of a thorough worst-case analysis further diminishes any assertions of compliance with policy.

It is evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overpowering and unavoidable. The change is thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

Collectively, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans is a significant flaw in the application, which relies heavily on undefined future measures. This deferral of critical environmental safeguards prevents an adequate evaluation of whether the necessary protections against pollution events are in place. Without robust emergency response procedures and contingency planning prepared prior to consent, there is a procedural risk that undermines the authority's ability to assess environmental protection measures effectively.

The sensitivity of the West Lewis coastline heightens concerns regarding the incomplete assessment of construction and pollution risks. This area is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for chemical or oil spills, it fails to provide sufficient detail on how these risks will be mitigated or monitored effectively.

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

From a regulatory standpoint, the failure to include detailed Construction

Environmental Management Plans or Pollution Prevention Plans contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and necessary mitigations are assessed prior to the granting of consent. The application's deficiencies in demonstrating compliance with policy requirements related to environmental protection and water quality further illustrate its incomplete nature.

Taken collectively, the lack of clearly defined mitigation measures and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings inhibit a thorough evaluation of construction and pollution risks and highlight the application's overall incompleteness.

FISHERIES AND MARINE LIFE

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

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

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

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

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

conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to consider the full range of impacts resulting from what constitutes a single integrated project. The offshore turbines are intrinsically linked to the onshore works, which include cabling across protected moorland and the construction of a substation near Stornoway. The necessary access infrastructure traverses sensitive landscapes and involves excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

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

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application lacks evidence that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented, resulting in a notable evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance; the disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or to demonstrate that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land could create conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, raising doubts about the deliverability and lawful implementation of the project.

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

Overall, the division of project components, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 assessment of tourism impacts presented in the application is significantly lacking, particularly in its failure to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which heavily relies on the area's stunning coastline, almost untouched landscapes, dark skies, and sense of seclusion, has seen 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. Despite the application noting that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution from tourism.

Moreover, the application neglects to model the potential impacts of the industrialisation of the seascape and deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the area. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect this established and expanding sector.

The role of environmental quality in enhancing tourism is another critical oversight, as unspoiled landscapes and dark skies significantly contribute to the visitor experience, particularly in emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment amplifies this shortcoming, creating a considerable gap in understanding the effects on a vital and growing component of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader ramifications for employment, local enterprises, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means 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 illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence result in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: 78B7244D

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection stems from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing material deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The documentation fails to provide a sufficient evidential basis for a lawful determination. It is noted that critical environmental data is absent, baseline information is both limited and inconsistent, and essential details of the proposal remain undefined. The application employs a flexible design framework, which obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures inhibits an assessment of their effectiveness. Consequently, the materials presented do not facilitate a comprehensive or informed understanding of potential environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack robust evidence.

There are substantive conflicts with policy that must be acknowledged. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such policy conflicts directly relate to the statutory tests required for consent and impede the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, particularly due to the large turbines being positioned in close proximity to the shoreline. This raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to deliver a clear, transparent, and dependable account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently and jeopardises the integrity of the assessment. Consequently, the impacts outlined may not accurately represent what will ultimately be constructed, preventing both the public and the relevant authorities from fully understanding the extent of the environmental effects.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed after approval restricts any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of crucial information to post-consent stages is procedurally unacceptable and contradicts the intentions of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies should be clearly established prior to any determination.

There are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly in cases where the report concludes negligible or non-significant effects without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing a level of scientific uncertainty that conflicts with statutory obligations.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unclear whether the impacts have been thoroughly assessed or if appropriate safeguards exist.

In summary, the combination of an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make a well-informed decision based on the information available.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly lacking, failing to accurately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon

and its undeveloped nature, which contributes to a strong sense of remoteness. The planned large-scale turbines, situated close to the shoreline, would impose a continuous industrial presence, fundamentally altering this unique character and leading to a permanent transformation of the landscape.

The visual change represented in the application is not sufficiently detailed. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic locations, and popular coastal sites. This dominance would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This limitation raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage adequately. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape, sharing visual and spatial connections to the Atlantic horizon. The assessment fails to consider these sites as interdependent assets, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape threatens to sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This issue is not limited to visual impacts but also encompasses broader cultural and spatial damages, which the application has not properly addressed.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The proposed scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further challenges any claims of policy adherence.

Ultimately, the impacts identified are not capable of being effectively mitigated. Due to the turbines' scale, height, and proximity, their presence will be dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, beyond the possibility of being lessened to acceptable levels through mitigation efforts.

In conclusion, the assessment does not accurately depict the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of ecological and socio-economic impacts related to fisheries and marine life. Off the West Lewis coast, there exists both a diverse marine ecosystem and a functioning fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and activities will be protected or maintained without significant disruption.

One of the critical flaws in the application is the assumption that fishing activity can be relocated without consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can support the additional pressure that would result from such displacement. This oversight is crucial, as it poses a risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a comprehensive and evidence-based assessment, the implications for fisheries and the livelihoods they support remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across significant distances, potentially impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects and fails to provide adequate supporting evidence.

In the application, there is an evident inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing potential impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment does not account for cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions present in the application render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

TOURISM

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

This sector has experienced considerable growth, with tourism revenue increasing from £65 million in 2017 to over £81.5 million and sustaining more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such an oversight prevents the determination of whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment does not adequately address the significance of environmental quality for tourism, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and foster emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding impacts on an acknowledged and growing component of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unevaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the economic dependencies of the island culminate in a significant evidential gap. This gap undermines a robust assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its failure to meet the requirements of sustainable development, as assessed against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was

deemed unacceptable due to the scale of industrialisation. Now, despite being put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short of the necessary standards.

The evidential basis for determining this application is incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures is problematic. Additionally, it overlooks essential impact pathways, including those concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are evident throughout the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties set forth in the Islands (Scotland) Act 2018. Furthermore, the omission of the full Social Impact Assessment constitutes a material failure. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in various areas. The evidential requirements needed to exclude adverse effects beyond reasonable scientific doubt have not been satisfied, necessitating the application of the precautionary principle, which prevents a lawful determination that impacts are acceptable.

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 adverse effects on tourism constitute permanent changes that cannot be adequately mitigated.

Overall, 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. Therefore, the competent authority must refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the missing information.

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C85A4A77

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 Environmental Impact Assessment Report presents significant shortcomings and does not deliver a full or transparent overview of the potential environmental impacts of the proposal. The introduction of a flexible Project Design Envelope, which lacks firm

commitments to specific dimensions or configurations of turbines, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and obscures the true environmental effects, preventing both the public and the competent authority from fully grasping the implications of the development.

Moreover, the application is heavily reliant on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. Seeking consent under the assumption that potential environmental damage will be managed later is unacceptable and hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. The deferral of critical information to stages following consent contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before any decision is made.

There exist substantial evidential gaps, including insufficient baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible effects are drawn without adequate supporting data. The lack of sufficient information prevents a comprehensive understanding of cumulative impacts and introduces scientific uncertainty that fails to align with statutory requirements.

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

In summary, the combination of an undefined design envelope, lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a thorough assessment of alternatives, failing to comply with the statutory requirements set by the Environmental Impact Assessment regime. It does not offer a well-structured or reasoned comparison of viable alternatives based on environmental impacts. Instead, the application presents a narrative of the project's evolution, which inadequately demonstrates that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a noticeable absence of transparent and evidence-based comparisons

concerning alternative offshore locations, development scales, or design configurations. Crucially, the application does not show that the developer has genuinely considered placing turbines further offshore, where impacts on visual aspects, ecology, and coastal integrity would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in determining environmental impact, the lack of this analysis obstructs any conclusion that the proposed site is the least damaging option available.

This inadequacy also extends to the assessment of cable routing and landfall, where there is insufficient evidence showing that alternative routes have been adequately investigated to avoid or minimise impacts on sensitive areas. Such areas include culturally and spiritually significant locations like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis illustrate that mitigation by design has not been employed, with the focus instead placed on measures to mitigate impacts after the design phase.

Consequently, the application fails to prove that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This not only represents a disregard for the established mitigation hierarchy but also impedes the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. A robust assessment of alternatives is vital to determine whether the proposal can be regarded as sustainable or compliant with policy.

From a policy standpoint, this shortcoming detracts from adherence to the National Planning Framework 4, particularly in safeguarding natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant oversight, contributing to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly addressed, and reliance on

modelling approaches introduces considerable uncertainty, particularly for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is incomplete and behavioural responses are not fully understood.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity surrounding the proposed development is severely lacking. It fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community intertwine. Instead, the application takes a simplified view, treating heritage as a collection of static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet they are portrayed as static features, overlooking their current usage and the development's impact on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

The application also disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions. These components are essential to the identity of the area, yet they are notably absent from the assessment, marking a significant oversight. Without evaluating these factors, it becomes impossible to fully grasp the

cultural implications of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to comply with established participation principles for decisions affecting cultural and environmental interests.

A critical procedural gap exists due to the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to hinder a lawful determination.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a significant departure from policy requirements.

Overall, the inadequacies in assessing living heritage, intangible cultural value, community rights, and legal obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application fails to offer a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's decision to withhold the complete Social Impact Assessment undermines the evaluation process concerning social impacts, health, and wellbeing. Although a Social Impact Assessment was commissioned, including focus groups with local residents, the full report has not been made available. This significant evidential gap obstructs public understanding and prevents the competent authority from assessing the extent of social risks identified in the developer's own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern stemming from the proposal's scale and proximity. These findings are based on direct engagement rather than speculation. However, the lack of disclosure regarding the full assessment limits scrutiny and hinders the ability to gauge the significance of these impacts in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been properly integrated into the main application or accorded appropriate weight. By not disclosing the complete Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also negatively impacts the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functioning could be at risk. Without the full dataset, the application fails to provide a complete evidential basis necessary for evaluating the balance of benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to support positive health outcomes and avoid harm; however, the evidence at hand reveals existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be established.

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, which constitutes a material omission within the application. This shortfall fails to meet the evidential requirements of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate, failing to accurately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines, located close to the shoreline, would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the magnitude of visual change. The turbines' scale and proximity would dominate views from residential locations, historical sites, and popular coastal areas. This would have a direct effect on visual amenity, diminishing the core qualities of naturalness and remoteness. The assessment fails to adequately capture the significance of this impact, particularly given the sensitive nature of the landscape involved.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that these viewpoints might not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and landscapes of high value. This oversight raises concerns that the magnitude of visual impact has been understated, consequently compromising the

assessment's reliability.

Additionally, there is a failure to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment considers these sites in isolation rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and breaking their connection to the natural horizon. This represents not only a visual detriment but also a wider cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The anticipated scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further diminishes any assertions of policy adherence.

It is evident that the identified impacts cannot be mitigated effectively. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Thus, the resulting change is fundamental and permanent, rendering any potential for mitigation to an acceptable level unlikely.

Collectively, the assessment does not accurately depict the scale of the impact, the environment's sensitivity, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to properly assess construction and pollution risks, which is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline, characterised by clean coastal waters and important habitats, is at risk from potential sediment disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental chemical or oil spills, it fails to outline how these risks will be prevented, controlled, or monitored.

Concerns are heightened by the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are set to be prepared after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness. This deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime, which mandates that

significant effects and mitigation must be evaluated before consent can be granted.

Moreover, there is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to potential effects on marine species and habitats identified as sensitive in broader assessments.

The lack of detailed emergency response procedures exacerbates these issues, as the postponement of contingency planning to a post-consent stage hampers the evaluation of whether adequate safeguards are in place to deal with pollution incidents. Consequently, this introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

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

A critical concern is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence to support the availability, accessibility, or capacity of alternative fishing grounds to handle the additional pressures that would result from displacement. This oversight is crucial, as the risk of overfishing in alternative locations could impose wider economic ramifications for the local fishing fleet. A clear, evidence-based assessment is necessary to understand the implications for fisheries and the livelihoods dependent on them.

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

There exists a troubling inconsistency within the application: it acknowledges the

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves infrastructure linked to offshore turbines and onshore works, which are not assessed as a single integrated project. This approach results in a fragmented evaluation that obscures the comprehensive environmental and socio-economic impacts of the development. Onshore components, including cabling across protected moorland, a substation construction near Stornoway, and the necessary access infrastructure, are significant in their implications, particularly as they involve excavation in deep peat areas like Barvas Moor. This region serves as a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts limits understanding of the project's complete environmental footprint.

Furthermore, by not properly evaluating onshore impacts, the application hinders the assessment of cumulative effects that arise when all project elements are considered together. The Environmental Impact Assessment mandates that both offshore and onshore aspects be viewed in conjunction, yet their separation leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to establish that all impacts on these areas have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential

conflicts with existing land use and legal rights. The application does not present evidence that necessary consents or processes have been initiated, which brings into question the feasibility and legality of the proposal.

From a policy standpoint, the lack of a holistic assessment and the failure to demonstrate adequate 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 further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, thereby creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration will fundamentally change the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that contribute significantly to the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment lacks any evaluation of the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This omission is particularly concerning given the significance of dark skies to the local identity and the development of tourism sectors such as astro-tourism. Consequently, the failure to consider these impacts results in a notable gap in the overall landscape and environmental assessment.

Moreover, there is no assessment of the impacts on nocturnal wildlife, which is a critical oversight. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, as they can become disoriented and face increased risks of collision. The application does not provide a lighting impact assessment or a study on phototaxis, thus failing to consider how aviation lighting may affect these species or contribute to higher mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this omission, as it does not account for nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not

met, thus invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this omission is in conflict with National Planning Framework 4 regarding the protection of natural places and the quality of the environment. It also undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

In summary, 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 renders the application incomplete and unable to support a lawful determination.

TOURISM

The application demonstrates a critical lack of assessment regarding the impacts on tourism, which is a vital sector for the Isle of Lewis economy. Tourism relies heavily on the natural attributes of the area, including its wild coastline, near-pristine landscape, dark skies, and unique sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it fails to quantify how the proposed large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution of tourism.

This sector has seen significant growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential negative impacts that the industrialisation of the seascape and decline in environmental quality could have on the Tourism Gross Value Added and broader economic resilience. Without this crucial analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or pose a threat to an established and expanding sector.

The assessment also overlooks the significance of environmental quality in enhancing tourism, such as the value of unspoiled landscapes and dark skies to the visitor experience, particularly in growing markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the effects on a vital and burgeoning part of the local economy.

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

From a policy perspective, the application does not satisfactorily demonstrate adherence to National Planning Framework 4, particularly regarding economic impact

and the need to show net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In conclusion, the failure to quantify tourism impacts, evaluate the environmental drivers affecting visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for assessment, with significant gaps in baseline data. It employs an undefined design envelope and depends on unspecified mitigation measures while failing to address critical impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment constitutes a substantial omission. These deficiencies 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 contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined 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 necessary regulatory provisions to demand the submission of the missing information.

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

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: D30ECE46

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the scale, proximity, and design of the wind farm raise serious questions regarding its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination, with critical environmental data either missing or inadequate. Baseline information provided is inconsistent, and several key elements of the proposal remain undefined. The flexible design framework employed prevents a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their efficacy unverified. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects are not underpinned by credible evidence.

Moreover, there are explicit and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns, particularly with large turbines positioned alarmingly close to the shoreline. This raises issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, reliance on vague mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents serious deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hampers the application of a worst-case scenario assessment, which is essential for understanding the true environmental impacts. Consequently, both the public and the competent authority are left uninformed about the actual extent of these effects.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet established. This approach seeks consent based on the notion that environmental harm will be mitigated later, thus obstructing any meaningful evaluation of the measures' effectiveness or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental aim of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined before any determination can be made.

Moreover, the report reveals significant evidential shortcomings, with evident gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty regarding the magnitude and significance of the impacts, particularly where claims of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that cannot satisfy statutory requirements.

As a result, the application does not meet the evidential standards required by the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Additionally, the proposal fails to adhere to the requirements set out in National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it cannot substantiate that the impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of clearly specified mitigation measures, and the noted gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These issues preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The proposal under consideration presents significant shortcomings in the assessment of alternatives, failing to satisfy the statutory obligations of the Environmental Impact

Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative fails to substantiate that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a conspicuous lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The West Lewis coastline is sensitive. Without this, it is impossible to assert that the proposed siting is the least damaging option available.

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

Consequently, the application does not convincingly establish that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the authority's ability to determine whether less harmful and more suitable alternatives exist. In the absence of a thorough assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents an assessment of marine ecology and protected species that is materially deficient, failing to deliver a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The core foraging range and behavioural patterns of otters have not been properly considered, meaning that the potential impacts of construction

disturbance, noise, and increased activity remain inadequately assessed. This lack of consideration undermines the conclusions drawn regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks suffers from further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations which indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions provided.

Due to these methodological limitations, the conclusions of negligible or non-significant effects rest on assumptions rather than robust evidence. Moreover, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby 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 unsupported conclusions render the assessment unreliable. These shortcomings prevent a rigorous evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a contradiction in the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the available evidence. Furthermore, the assessment does not

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

The location of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not properly assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential standards needed to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling issues, fails to fulfil the requirement of being beyond reasonable scientific doubt. This invokes the precautionary principle and obstructs a lawful conclusion that could support consent. Additionally, these shortcomings indicate a lack of compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided fails to adequately evaluate community identity and cultural heritage, notably overlooking the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are fundamentally interwoven. By adopting a reductive perspective that treats heritage as a collection of isolated and static assets, the application neglects to recognise their ongoing social, cultural, and spiritual relevance within the community.

There exists a significant deficiency in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are not merely static features; they are active places of burial and spiritual practice. The current assessment mischaracterises these locations, failing to account for their continued use and meaning, as well as the potential impacts of development on their surroundings. Such misrepresentation results in an incomplete evaluation of the cultural effects and disregards their importance in community life.

Additionally, there is a troubling absence of consideration for intangible cultural heritage, which includes vital elements such as the Gaelic language, local traditions,

and the deep-rooted relationship between the community and the coastal environment. These aspects are central to the area's identity but have been entirely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles for participation in decisions affecting cultural and environmental matters.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment inhibits the competent authority from fulfilling 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 place the proposal in direct conflict with the National Planning Framework 4, particularly with respect to the protection of historic assets and places. The failure to adequately consider both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application does not present a robust foundation for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The inadequacy of the assessment concerning social impacts, health, and wellbeing is evident, particularly in terms of transparency necessary for a lawful evaluation. The developer has engaged in a Social Impact Assessment, which included focus groups with local residents, but the full report remains unpublished. This absence of information creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted in the developer's own research.

Summaries that are available suggest that residents are already facing quantifiable stress, anxiety, and concern linked to the scale and closeness of the proposed development. These effects are based on direct engagement, indicating they are not mere speculation. However, without the full assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” specifically noted in the developer’s findings. Despite the recognition of these impacts, they have not been adequately incorporated into the primary application nor afforded the necessary consideration. The lack of disclosure surrounding the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency has further repercussions for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this nature, especially where community character and functioning might be affected. By failing to provide the complete dataset, the application does not present a full evidential basis for weighing the benefits against the potential harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and avoid detriment; however, the available evidence highlights existing negative effects that have not been fully revealed. Without access to the complete assessment, the application cannot prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the lack of access to the full Social Impact Assessment. This constitutes a material omission within the application, resulting in a failure to satisfy the evidential requirements stipulated by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment 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 application presents significant shortcomings that raise urgent concerns regarding environmental protection. There is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This lack of detail hampers the evaluation of likely environmental effects, as the proposal involves extensive seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. By relying on undefined future mitigation and

contingency measures, the application leaves critical questions about their adequacy and effectiveness unanswered.

Particularly alarming is the potential impact on the West Lewis coastline, which is home to clean coastal waters and vital habitats. These areas are highly sensitive to disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and possible chemical or oil spills, it fails to adequately outline how these threats will be managed or mitigated. The uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation adds to the urgency of these concerns, as it is impossible to ascertain the ecological effects without comprehensive modelling and management strategies.

Moreover, the lack of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether suitable safeguards are established to handle potential pollution events. This procedural gap introduces significant risks, making it difficult for the competent authority to assess environmental protection measures at the crucial stage of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding possible impacts render the assessment fundamentally deficient. These issues collectively hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a number of significant deficiencies in its assessment of marine life and fisheries, leading to an inadequate understanding of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate the ability to protect or sustain these critical uses and habitats without causing substantial disruption.

A major concern lies in the erroneous assumption that displacing fishing activities will occur without negative repercussions. There is no evidence provided that indicates the availability of alternative fishing grounds that are both accessible and capable of sustaining the additional pressure that may result. This absence is crucial, as displacement could lead to overfishing in other areas and bring about significant

economic ramifications for the local fishing fleet. The impacts on fisheries and local livelihoods remain unclear without a thorough and evidence-based assessment.

The proposal also poses considerable risks to marine species, especially due to the underwater noise associated with construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to create disturbances that extend over large distances, potentially impacting species like dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population raises alarming concerns, yet these effects are inadequately addressed in the application, which downplays their significance without adequate supporting evidence.

Furthermore, there is a clear inconsistency in the application where the necessity for licences to permit harm to European Protected Species is acknowledged, while the impacts are concurrently described as negligible. This contradiction undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that would legally require authorisation.

The evaluation does not adequately take into account cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough consideration of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, casting doubt on whether this proposal qualifies as sustainable development.

In summary, the lack of evidence regarding the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies in the application contribute to an incomplete and unreliable assessment. These flaws hinder the ability to thoroughly evaluate the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore components involve the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure traversing sensitive landscapes. Notably, these works include excavation in areas of

deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts comprehensively, the application fails to enable a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; the disjointed assessment of offshore and onshore elements prevents a full understanding of the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting will be visible over long distances and creates a continuous intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially important given the role of dark skies in the area's identity and the potential for growth in tourism sectors such as astro-tourism. The omission of these impacts results in a notable shortfall in the overall landscape and environmental assessment.

Additionally, there is a complete absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and higher collision risks. The application lacks any lighting impact assessment or study of phototaxis, failing to consider how the proposed 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 does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites could be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

TOURISM

The application under consideration presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate both the economic and social ramifications for a vital sector of the Isle of Lewis economy. The economy of the island is heavily reliant on its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application fails to provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic

contribution of tourism.

Tourism on the Isle of Lewis has experienced noteworthy growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. However, there is no modelling of how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear whether the proposed development would bring about a net economic benefit or harm an already established and expanding sector.

Another critical aspect overlooked in the assessment is the importance of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment only exacerbates this issue, resulting in a substantial gap in understanding the potential effects on a recognised and thriving part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications, affecting employment, local businesses, and overall community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the central issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, 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 falls short.

There are significant gaps in the evidential basis necessary for determination. It lacks complete baseline data, employs an undefined design envelope, relies on unspecified

mitigation measures, and omits critical impact pathways, including those affecting nocturnal wildlife, full 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.

Additionally, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. There is insufficient evidence to confirm that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impacts of both offshore and onshore elements have not been appropriately assessed, leading to obscured effects on peatlands, habitats, and crofting land.

Uncertainty remains regarding environmental risks, which could be significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been reached, thus invoking the precautionary principle and barring a lawful conclusion that impacts are acceptable.

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

In light of these factors, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful, evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate 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 am writing as someone who was born and raised on Lewis, who now lives away but comes home as often as I can. The stretch of ocean off the west coast is not an abstract

“resource” to me. It is the constant but ever-changing backdrop to life in our crofting townships; much more than a pretty view, it is the sea that provided the fish my ancestors depended on for their survival, but also the raging tumult that claimed some of their lives; it is natural and unspoilt, wild and untamed, a solace for the soul, an escape from modern industrialised life and a huge part of the draw to the islands for the crowds of tourists that visit every year; it is the home of countless types of wildlife and the route of countless migrating birds that mark the seasons more reliably than any calendar.

The Spiorad na Mara Offshore Wind Farm is proposed in the waters to the northwest of Lewis, with an offshore array area and cable corridor running to landfall options on the west side of the island and then onshore along a corridor towards a grid substation near Stornoway. This is an enormous industrial development pushed right up against a fragile, natural and on the whole unspoilt coastline that has never hosted anything on a scale even remotely like this before.

My concerns are numerous. First is the impact on the marine environment. The project’s own Environmental Impact Assessment (EIA) and Outline Offshore Environmental Management Plan list “key environmental aspects” of the offshore project, including underwater noise from construction, seabed disturbance from foundations and cable installation, and the need for mitigation around marine ecology and water quality. These are not hypothetical worries invented by opponents; they are acknowledged issues in the developer’s own documents. Piling, trenching and rock placement on this scale inevitably mean loss or alteration of benthic habitats, increased suspended sediment, and chronic disturbance in an area that has, until now, been at most lightly industrialised.

As someone who grew up with fishermen as friends and family, I am particularly troubled by what this means for fishing grounds and livelihoods. From the way the scoping and EIA documentation is structured—with specific chapters for “offshore” receptors and the need to assess socio economic and marine use interactions—it is clear that commercial fisheries are recognised as a receptor that may be significantly affected by the array and cable corridor. On the water, that translates into real people facing exclusion from traditional grounds, displacement into more marginal or crowded areas, increased sailing times around safety zones, and the long term uncertainty that comes when a working sea is turned into an industrial zone. Even if the developer offers compensation or “co existence” measures, that does not replace the security of being able to fish freely in the grounds your family has used for generations.

The project’s ornithology work makes it very clear that the waters and coasts off Lewis are of high importance for seabirds and other marine birds. The dedicated Marine and Nearshore Ornithology chapter of the EIA, and its detailed baseline appendix, describe significant populations of seabirds using the area for foraging, commuting and migration, and note recent declines in several seabird populations. The Appropriate Assessment documentation further identifies multiple European and national designated sites for birds and other features that could be affected by the offshore project, including Special Protection Areas (SPAs) and other designated sites listed in

its appendices.

Those technical documents translate, on the ground (and in the air), into a very simple reality: this is a crucial flyway and feeding area for birds that are already under pressure. Many of the seabird species that breed in the wider region, as well as pass through it as they migrate, are now classed as being of high conservation concern in national assessments, including some species being red-listed, and the project's own baseline report notes negative trends for several seabird populations. Adding a dense field of large turbines into that environment brings collision risk, barrier effects on migration routes, and displacement from feeding areas. Even if the modelling concludes that impacts are "acceptable" in policy terms, the margin for error for red listed or otherwise vulnerable species is vanishingly small and what is deemed "acceptable" in policy terms could be the final death knell for a bird population that is already on the brink.

Onshore, the proposal would drive a cable corridor and associated infrastructure from landfall on the west coast across Lewis towards Stornoway. That means trenching, access tracks, compounds and permanent built structures imposed on peatlands, crofting landscapes and views that are currently defined by open moor, machair and sea. The Appropriate Assessment material acknowledges that there are multiple designated sites—SPAs, SACs, SSSIs and National Scenic Areas—within the zone of influence of both the offshore and onshore works, and that these must be considered in the Habitats Regulations Appraisal.

For those of us to whom these are real places, our home, who know these places not as lines on a constraints map but as the backdrop to daily life, the idea of huge offshore turbines dominating the horizon just off the west side, with substations and cables cutting across the island, is a fundamental ruination of wild landscape and seascape. The Offshore Planning Statement itself accepts that seascape, landscape and visual impacts are key issues for assessment, and that the project must be tested against national and regional policy on protecting valued seascapes and coastal character. It is hard to see how a development of this unprecedented scale, so close to the coast, can be reconciled with the idea of safeguarding the special qualities of nearby National Scenic Areas and SSSIs.

And this is where the wider context matters. Scotland and the UK's planning and marine planning systems are simply not built to cope with the onslaught of gigantic energy developments now being pushed through under the banner of "net zero." The legislation and policy framework — including the Scottish marine planning system and the sectoral marine plans referenced in the Offshore Planning Statement — was never designed for dozens of overlapping mega projects, each assessed in isolation, with no coherent oversight of cumulative effects. The result is a piecemeal process that pretends to be strategic but in reality allows the gradual destruction of vast areas of landscape, seascape and habitat.

"Net zero" has become a political slogan and a convenient bandwagon for every money making enterprise to jump onto, greenwashing their intentions while exploiting land,

sea and communities. The idea that these projects are “saving the planet” is treated as unquestionable dogma, even though the environmental destruction they cause is plain to see. Politicians seem blinded by the label — as if calling something “net zero” magically makes it environmentally benign. Meanwhile, the reality on the ground is that our homes, our landscapes and our ecosystems are being sacrificed for energy that will largely be exported to the highest bidder.

Comhairle nan Eilean Siar has not helped. By claiming that communities are “in favour” of these developments, it has misrepresented the reality on the ground and betrayed the very people and environments it is supposed to steward. That narrative conveniently aligns with the Comhairle’s own financial interests in seeing these projects proceed, but it does not reflect the views of many islanders who stand to lose the most.

There is also the question of what this means for nearby coastal communities. The project description and planning statement make clear that the turbines will be gigantic in their own right and certainly in comparison to anything that already exists locally, and that the array will be located relatively close to the Lewis coastline within the defined offshore boundary. For villages along the west side, that means a permanent industrial skyline where there is currently open ocean, with associated night time lighting, vessel traffic during construction and operation, and the psychological shift from living beside a wild Atlantic to living beside an energy factory. That is not a small change; it goes to the heart of sense of place, tourism appeal, and the everyday experience both of people who have chosen to live in these communities and of those whose ancestors have lived in the same places and worked the same seas for generations (and who have been exploited by external forces for generations, too—many comparisons could be drawn between the current planned projects and the Clearances).

In terms of the legal and policy framework, my objections are grounded in the same legislation the developer relies on. The Scottish Ministers’ scoping opinion for Spiorad na Mara confirms that the project falls under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, and sets out the need for a robust EIA covering all relevant receptors, including marine ecology, ornithology, seascape/landscape and socio economics. The Offshore Planning Statement explains that the project must also be assessed against the Scottish and UK Government policy framework, including the requirement to comply with the Scottish marine planning system and relevant sectoral marine plans for offshore wind.

Given the acknowledged importance of the area for seabirds and other qualifying features, and the documented negative trends in some of those populations, I do not believe that certainty that there will be no adverse effect on habitats can honestly be claimed for a development of this scale so close to key foraging and migration areas.

Under Scotland’s marine planning legislation and policy—as summarised in the project’s own planning statement—there are clear general principles that require: safeguarding of marine ecosystems and biodiversity; protection of the natural and

historic environment, including designated sites; careful consideration of cumulative impacts; and support for sustainable economic uses such as fishing. In my view, and in the lived experience of those of us who know this coast, Spiorad na Mara fails those tests. It concentrates risk on already pressured bird populations, industrialises a relatively unspoilt stretch of sea and coast, undermines the security of local fisheries, and erodes the very landscape and seascape qualities that designations and policies are supposed to protect.

The environment will not be protected by action that sacrifices irreplaceable marine and coastal environments, and the communities and wildlife that depend on them. Such action is not justifiable in any way. On that basis, and for all the reasons set out above, I object to the granting of a marine licence 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: F056E24E

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming of the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are categorised as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to an incomplete evaluation of the cultural effects and disregarding their importance in community life.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their link to the natural horizon. This results in not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough 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 scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelming. The resultant change is therefore fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the scale of impact, the

sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application fails to provide a comprehensive assessment of fisheries and marine life, resulting in an inadequate evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital uses and habitats can be adequately protected or maintained without causing significant disruption.

One critical concern is the flawed assumption that fishing activities can be displaced without consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressures from such displacement. This significant oversight raises the risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended duration is likely to create disturbances over large distances, adversely affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects, lacking adequate supporting evidence.

There are notable inconsistencies within the application itself; it acknowledges the necessity of licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

Moreover, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be adequately assessed.

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

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

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 assessment of tourism impacts associated with the application is fundamentally flawed and does not adequately evaluate the economic and social consequences for a

vital sector of the Isle of Lewis economy. With tourism having expanded notably from £65 million in 2017 to over £81.5 million, it currently supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the application does not adequately model how the industrialisation of the seascape and the potential degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the community.

Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by scenery but fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution. Additionally, the assessment neglects to address the critical role of environmental quality in enhancing the tourism experience, particularly regarding unspoiled landscapes and dark skies, which are increasingly important for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, resulting in a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

Given that the island community has limited economic diversification, the failure to assess impacts on tourism carries broader implications for local employment, businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018. Furthermore, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the need to show net benefit. It also contradicts strategic objectives identifying tourism as a priority growth sector and lacks sufficient evidence for the competent authority to adequately assess the economic consequences of the proposal.

In summary, the combined failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and acknowledge the island's economic reliance on tourism creates a considerable evidential gap. This deficiency hinders a robust evaluation of the 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 of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

The application lacks a complete and reliable evidential basis for determination. Significant gaps exist in the baseline data, and the use of an undefined design envelope

raises concerns. Mitigation measures are not specified, and key impact pathways such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have been omitted. Consequently, the Environmental Impact Assessment is incomplete and does not provide a clear understanding of the likely significant effects or residual impacts.

There are also evident procedural failures in the application process. The absence of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts directly with the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It fails to confirm that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to significant 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 impact on tourism represent permanent changes that cannot be effectively mitigated.

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

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

Additional Comments

I object for many reasons, particularly as the communities affected by this development have not been consulted in the early stages of this development and their

opinions do not appear to have been adequately considered. The level of impact of island life during the project and after is enormous and, should it go ahead, the compensation for the islands and their people is negligible. We need ways to improve our electricity generation but this is an area of outstanding beauty and a gentle way of life that is worth preserving.

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: 508455A1

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and supporting documents. It highlights deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The 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. The proposal's scale, proximity, and design raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal all contribute to this inadequacy. The use of a flexible design framework obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation does not facilitate a complete or informed understanding of the environmental, cultural, or community impacts. The claims of negligible or non-significant effects are not backed by robust evidence.

There are significant conflicts with established policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to determine that the development is policy-compliant.

The scale of the proposal is unprecedented for this area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy demonstrates 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 presents significant deficiencies and fails to deliver a full, transparent, or reliable account of the expected 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 approach compromises the integrity of the assessment, making it impossible for the public and competent authorities to fully understand the potential environmental impacts of the development, as the effects outlined may not accurately reflect what will ultimately be constructed.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later date prevents a meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the core objective 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 gaps, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Consequently, the application fails to satisfy the evidential standard stipulated under the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on environmental

impacts, it presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in determining impact makes the absence of this analysis significant, preventing any determination that the proposed siting is the least damaging option.

Furthermore, the inadequacies extend to 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 sites such as Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been employed. Instead, the application relies on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the overall finding that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species exhibits significant deficiencies that undermine the reliability of its findings concerning ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the data provided is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species, resulting in an absence of a sound evidential basis for evaluating potential impacts.

One critical shortfall in the assessment is the failure to adequately acknowledge and evaluate the active use of coastal areas by otters, a species protected under European law, for both foraging and movement. This oversight neglects to consider their core foraging range and behavioural patterns, thus failing to assess the potential effects of

construction-related disturbance, noise, and increased activity. This oversight compromises the validity of any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic, as it introduces considerable detection bias, particularly under the conditions typical of the Atlantic. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent utilisation of these waters. The neglect to incorporate or properly evaluate such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. Consequently, there is considerable uncertainty surrounding the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements outlined within the Environmental Impact Assessment regime and the National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the lawful grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents several significant constraints and sensitivities that undermine the validity of the ornithological assessment. It contains material flaws, evidenced by notable gaps and internal inconsistencies, which raise serious doubts about its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are currently experiencing decline. However, the assessment does not convincingly demonstrate, to the required evidential standard, that these species will remain unaffected by the proposed development. This proposal is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately address the implications related to displacement, collision risk, or habitat loss.

Additionally, the application exhibits a fundamental contradiction. The developer

asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency casts further doubt on the reliability of the assessment, indicating that its conclusions are not backed by the necessary evidence. The assessment falls short in providing adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The importance of these feeding grounds is insufficiently recognised, and the reliance on modelling methods introduces uncertainty, particularly for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially given that baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor poses additional significant risks, as it effectively creates a barrier along 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 continued mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is another concern; the application fails to meet the evidential threshold necessary to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, paired with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders the conclusion supporting consent unlawful.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is seriously lacking. It overlooks the West Lewis coastline as a vibrant cultural landscape where community, language, tradition, and environment are interconnected. The application reduces heritage to mere static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised. These sites serve as active places for burial and spiritual practice, yet they are treated as unchanging features. This oversight fails to take into account their continued use and the effects of development on their environment. As a result,

the evaluation of cultural impacts is incomplete, neglecting their vital role in community life.

Moreover, the assessment does not address intangible cultural heritage. Key elements like the Gaelic language, traditions, and the community's enduring relationship with the coastal landscape are crucial to the area's identity but are notably absent from the assessment. This omission hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of engagement calls into question the validity of the assessment and ignores established principles of participation in matters affecting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historical assets and locations. Not considering both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy standards.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current evaluation of social impacts, health, and wellbeing is lacking in transparency and is materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report has not been published. This omission creates a significant evidential gap, making it difficult for both the public and the competent authority to grasp the full range of social risks identified by the developer's research.

Available summaries suggest that residents are facing measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are not speculative in nature. Nonetheless, the failure to release the complete assessment inhibits thorough scrutiny of the findings and restricts the ability to evaluate their

significance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with concerns about "cultural loss" highlighted in the developer's findings. Despite this, these social impacts have not been adequately integrated into the application or afforded the necessary weight. The absence of the full Social Impact Assessment clouds the understanding of the genuine human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is critical for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a thorough evidential basis to assess the balance of benefits and harm.

From a policy viewpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm; however, the evidence available indicates that adverse effects already exist and have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is not achievable.

The procedural consequences are notable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This lack of information constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, along with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This undermines the ability to make a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of 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 West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. However, the assessment of construction and pollution risks related to the proposal is incomplete, lacking the necessary detail to evaluate the likely environmental effects. The project entails significant seabed preparation and installation works within a high-energy Atlantic

environment, yet fully developed Construction Environmental Management Plans or Pollution Prevention Plans are absent. The application relies instead on mitigation and contingency measures that would be prepared post-consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, especially given the sensitivity of the receiving environment. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide adequate detail on how these risks will be prevented, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these disturbances.

The absence of detailed emergency response procedures compounds these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether sufficient safeguards are in place to manage potential pollution events. This introduces procedural risk and limits the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and without this crucial information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a reliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not adequately demonstrate that these vital habitats can be preserved without considerable disruption.

One major concern is the unsubstantiated assumption that fishing activity can be displaced without adverse effects. There is no evidence provided to indicate that alternative fishing grounds exist, are accessible, or are capable of accommodating increased pressure from displaced fishing efforts. This oversight is critical, as the potential for overfishing in other areas poses economic risks for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the implications

for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over extended periods is likely to disturb marine life over considerable distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially in instances where harm is expected to a degree that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. However, the assessment of these onshore elements is materially incomplete and fails to consider the full extent of impacts arising from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked but are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The application does not provide a comprehensive assessment of the impacts associated with excavation across areas of deep peat, particularly within Barvas Moor,

which serves as a significant carbon store and ecologically sensitive habitat. By excluding or deferring the assessment of onshore impacts, the application prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; however, the separation of offshore and onshore elements results in a failure to fully understand the combined impacts on peatlands, habitats, and communities.

Moreover, there are substantial risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap concerning biodiversity protection. Additionally, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights, as the application lacks evidence that the necessary consents or processes have been initiated. This raises questions regarding the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to evaluate the project as a whole and to demonstrate protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to establish that impacts can be avoided or mitigated further undermines the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thereby preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks any evaluation of the effects of artificial lighting on nocturnal wildlife, which is a critical omission within the Environmental Impact Assessment. Specific species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly susceptible to artificial lighting due to their phototactic responses, leading to disorientation and increased collision risks. There is no lighting impact assessment or phototaxis study included in the application, meaning the potential impacts of aviation lighting on these species and the consequent risk of increased mortality remain unassessed.

Furthermore, the assessment relies solely on daytime survey data, neglecting the nocturnal activity and associated hazards that many species face. For instance, Kittiwakes, which may forage or migrate during the night, are vulnerable to the disorienting effects of artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Additionally, the evaluation of dark skies is entirely missing, which represents a material oversight. The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and

tourism potential. The introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. The absence of an assessment regarding the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors is particularly concerning, especially given the growing importance of dark skies to the local identity and tourism sectors such as astro-tourism.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall setting.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis results in an incomplete application, which is incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts within the application is significantly lacking and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The region's tourism is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a feeling of remoteness. Despite the application noting that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution.

Tourism in the area has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application does not model the potential impacts on Tourism Gross Value Added or the broader economic resilience resulting from the industrialisation of the seascape and the degradation of environmental quality. Without such an analysis, it remains unclear whether the development would provide a net economic benefit or pose a threat to an established and growing sector.

Moreover, the assessment neglects to address the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences, along with emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortcoming, leading to a considerable gap in the understanding of impacts on an acknowledged and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been considered as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity of proving net benefit. Furthermore, it contradicts strategic objectives that recognise tourism as a key growth sector and fails to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and acknowledging the island's economic dependencies lead to a significant evidential gap. This undermines the ability to carry out a thorough evaluation of economic effects and supports 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.

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: C516FEBB

