

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns about compatibility with statutory requirements, national policy, and sustainable development principles are paramount given the scale, proximity, and design of the project.

The application does not provide a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal are undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to offer a comprehensive understanding of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack solid evidence.

There are evident and substantial policy conflicts as the proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The scale of the proposal is unprecedented for this location, with large turbines proposed in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. Taken as a whole, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data severely compromise the Environmental Impact Assessment Report, making it unreliable and incomplete. This combination of deficiencies leads to an assessment that cannot lawfully or robustly evaluate environmental effects, thereby leaving the competent authority unable to make an informed decision based on the provided information.

The application places undue emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these circumstances means that any environmental harm is intended to be addressed later, which hampers the ability to effectively evaluate these measures or assess any residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable, contradicting the essential aim of the Environmental Impact Assessment regime that mandates clear establishment of significant effects and mitigation prior to any determination.

There exist substantial evidential deficiencies, including missing baseline data and limitations in methodology, along with an over-reliance on assumptions rather than site-specific evidence. These issues generate uncertainty around the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information inhibits a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that cannot be aligned with statutory requirements.

The application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been fully assessed or that appropriate safeguards are in place.

The deficiencies in the Environmental Impact Assessment Report, stemming from the flexible Project Design Envelope that lacks commitment to specific turbine dimensions and configurations, introduce significant uncertainty. This uncertainty ultimately undermines the integrity of the assessment and obscures the actual environmental impacts from both the public and the competent authority, leaving a critical gap in understanding the true extent of potential effects from the development.

ASSESSMENT OF ALTERNATIVES

The absence of a rigorous and thorough assessment of alternatives is alarming and fundamentally undermines the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a clear, reasoned comparison of viable alternatives based on their environmental effects, the application merely recounts the project's development history. This method falls short of proving that less damaging options have been appropriately identified, assessed, and preferred over more harmful solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding various offshore locations, development sizes, or design configurations. In particular, the application fails to illustrate that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, alongside the crucial role that proximity to shore plays in determining environmental impacts, highlights the significant gap in analysis that prevents a conclusion that the proposed siting is the least damaging option.

These shortcomings extend to the assessments related to cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and a comparative analysis indicates that mitigation by design has not been employed, relying instead on measures to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that efforts have been made to minimise environmental harm through thoughtful site selection, layout, and infrastructure routing. This signifies a disregard for the established mitigation hierarchy, which consequently hampers the competent authority's ability to determine whether there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, one cannot assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and the wellbeing of local communities. The failure to present a structured and comparative assessment represents a significant omission, contributing to the conclusion that the application has not been thoroughly evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding marine ecology and the assessment of protected species, which is materially deficient. The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the existing baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. This inadequacy leads to a lack of sound evidential basis for evaluating potential impacts.

Among the key issues is the failure to recognise and properly assess otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The application does not take into account their core foraging range and behavioural patterns, which means the assessment does not adequately consider the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines any conclusions drawn regarding the absence of significant effects on this

species.

Furthermore, the assessment of basking sharks exhibits similar deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which is likely to underestimate their presence. This is particularly concerning when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or give proper consideration to such data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. Additionally, the absence of sufficient baseline data hinders meaningful evaluations of cumulative and indirect impacts, which include seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately demonstrate that these species will remain unaffected by the proposed development. Key foraging areas and migratory pathways are located within the project area, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major inconsistency arises within the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation. This derogation is typically needed only when significant harm is anticipated, thus casting doubt on the reliability of the assessment and suggesting that its conclusions lack supporting evidence. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda

will remain unharmed. The importance of these feeding grounds has not been fully addressed, and the use of modelling approaches introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor poses an additional risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term impacts of increased mortality in this corridor or consider the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential threshold to assert no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and undermines any lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language, local traditions, and the historical relationship between the

community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

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

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to acknowledge living cultural practices represents a significant departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development lacks a comprehensive assessment of social impacts, health, and wellbeing, raising significant concerns regarding transparency and compliance with legal evaluation standards. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This absence of information creates a crucial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts are based on direct engagement with the community and are therefore substantiated rather than speculative. However, the failure to disclose the full assessment prevents proper scrutiny of these findings and constrains the ability to assess their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Despite this acknowledgment, the application has not adequately integrated these impacts or assigned them appropriate weight. By withholding the complete Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also 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 they may affect community character and functioning. Without access to the complete dataset, the application falls short of providing a full evidential basis for balancing potential benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy is unproven.

The implications of this procedural deficiency are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This failure to meet evidential requirements of the Environmental Impact Assessment regime ultimately renders the assessment incomplete and unreliable. Consequently, a lawful determination cannot be made, reinforcing the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal significantly undermines the assessment of seascape, landscape, and visual impacts, failing to adequately capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the shoreline would establish a persistent industrial presence, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

The application does not sufficiently illustrate the extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately reflects this level of impact or its significance within such a sensitive landscape.

Methodological issues arise regarding the selection and representation of visual viewpoints. There is evidence indicating that the viewpoints chosen may 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, which compromises the reliability of the assessment.

Furthermore, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. The assessment treats these important assets in isolation, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived 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 thoroughly assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The magnitude of change is incompatible 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 diminishes any assertion of policy compliance.

It is evident that the impacts noted cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting transformation is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is notably incomplete and lacks the necessary detail to evaluate potential environmental effects. It entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is troubling. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures in light of 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 risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential effects on marine species and habitats recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs an evaluation of whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents a number of significant deficiencies that hinder a reliable evaluation of its impacts on marine life and fisheries. A key concern is the application's inadequate assessment of fisheries and marine life, which fails to provide a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be safeguarded from substantial disruption.

There is a troubling assumption within the application regarding the displacement of fishing activities. It suggests that this can occur without any adverse consequences, yet there is no evidence to support the availability or accessibility of alternative fishing grounds capable of handling the added pressure. This is a serious omission, as such displacement could lead to overfishing in other areas, potentially resulting in significant economic repercussions for the local fishing fleet. Without a clear and evidence-based

assessment, understanding the effects on fisheries and local livelihoods becomes impossible.

Additionally, the proposal raises alarming risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb marine life across wide areas, including vulnerable species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is deeply concerning, yet the application minimizes the significance of these effects without adequate supporting evidence.

The application exhibits a notable inconsistency: while it acknowledges the necessity of licences for harm to European Protected Species, it simultaneously asserts that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Moreover, the assessment does not account for cumulative impacts that could arise from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which is essential for concluding that the project represents sustainable development.

In summary, the lack of supporting evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application 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 infrastructure assessment is incomplete and does not consider the full range of impacts associated with this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure in sensitive landscapes. These activities involve excavating deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which hampers understanding of the project's total environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. The separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Significant risks to sensitive habitats, including machair systems and peatland environments, are evident, with these areas receiving policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, highlighting a gap in biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that undermines renewable energy objectives. The application does not sufficiently address this issue or prove that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence of necessary consents or processes being initiated, creating uncertainties about deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably lacks any examination of dark skies and nocturnal wildlife, which is a serious omission. The West Lewis coastline is renowned for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, creating an intrusive "wall of light" effect along the western horizon and fundamentally changing the night-time landscape.

Furthermore, the application fails to evaluate how this lighting will impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly significant considering the crucial role dark skies play in the local identity and the growth of tourism sectors such as astro-tourism. The neglect of these issues indicates a clear deficit in the overall landscape and environmental evaluation.

More concerning is the lack of analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means there is no consideration of how aviation lighting could impact these species or heighten 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 dangers. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data results in a significant gap in understanding the ecological implications.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural environments and the preservation of environmental quality. Additionally, they weaken the overall assessment of landscape and seascape impacts since the character of night-time environments is a vital aspect of the ecological landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a considerable evidential shortfall. The lack of baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

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

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

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

From a policy standpoint, the application does not meet the criteria outlined in the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a serious evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. The application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

There are significant gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further complicates matters, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to the absence of tourism impact modelling. Additionally, the cumulative impact of offshore and onshore components has not been properly assessed, obscuring effects on peatlands, carbon balance, habitats, and

crofting land.

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

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

Collectively, these issues render the application procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the missing information.

In light of these factors, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I grew up on Lewis & visit every year now since I've moved away, apart from the awful visual that this offshore windfarm will create, the impact on the sea/wild/bird life in the area is a huge part of my objection. Why take such an unspoiled part of our beautiful country & inflict this monstrosity on it? The people who live on the West coast of Lewis have the most stunning uninterrupted views but will now need to look upon this?! We are surrounded by the ones on land here in South Lanarkshire & more are being erected! It looks awful, the noise from them is awful & our once beautiful hills are covered in them. If they must be put up somewhere then put them so far off land that they cannot be seen but I object to them anyway as the sea life do not need humans causing them any more issues than they already face! I stand with the islanders who do not want this & support them 100%. I will be disgusted if this goes ahead knowing how much it is objected by the people who live there.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E72481DD

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Dear Sir/Madam

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

One of the key issues is that the application does not present an adequate evidential basis necessary for a lawful determination. It is evident that critical environmental data is absent, and the baseline information provided is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined, which hinders the ability to assess potential impacts accurately. The reliance on a flexible design framework obscures an understanding of likely significant effects, while the unspecified mitigation measures leave their effectiveness uncertain. Consequently, the existing documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal conflicts with several policies, showcasing inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident with respect to biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application has not adequately demonstrated compliance with national obligations aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are central to the statutory tests required for consent and fundamentally undermine the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal introduces substantial concerns related to landscape capacity, visual dominance, and environmental impact, especially given the positioning of large turbines in close proximity to the shoreline. When considering the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically active but also highly sensitive, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, which undermines the reliability of the assessment's conclusions regarding potential impacts.

One critical area of concern is the treatment of otters, a species protected under European law. The application neglects to adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. This oversight means that the effects of construction disturbances, noise, and increased activity on their core foraging areas have not been properly assessed, leading to a misrepresentation of potential significant impacts on this species.

Similarly, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduces considerable detection bias, particularly in the challenging Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, especially when contrasted with the more reliable land-based observations that indicate these waters are frequently used by basking sharks. By failing to adequately incorporate or consider such vital data, the assessment falls short, resulting in an incomplete baseline.

These methodological flaws mean that any conclusions drawn about negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of robust baseline data impedes a meaningful assessment of cumulative and indirect impacts, including those related to seasonal changes and broader ecosystem interactions. This leaves considerable uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed the protected species in the area. The uncertainties raised prevent a definitive exclusion of adverse effects, necessitating the application of the precautionary principle. In light of these issues, consent cannot be lawfully granted.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species, thereby indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment characterised by significant evidence gaps and internal contradictions that undermine its validity. It is crucial to highlight that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already declining. Despite this, the application fails to satisfy the evidential requirements to demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory pathways, yet the assessment inadequately addresses the risks of displacement, collision, or habitat loss.

Moreover, a core inconsistency emerges in the application, as the developer claims no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising serious questions about the assessment's reliability and suggesting that its conclusions lack support from the underlying evidence. The assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces further uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline. Furthermore, the applied methodologies are likely to underestimate mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within an acknowledged migratory corridor introduces additional and significant risks, effectively forming a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor and the potential impact on species with relatively small global populations are not sufficiently evaluated in the application.

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 findings, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation activates the precautionary principle, which precludes a lawful conclusion in favour of consent. Additionally, 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 significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such deficiencies obstruct a thorough evaluation of impacts and substantiate 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 significantly flawed, failing to adequately capture the extent of change or the sensitivity of the receiving environment. The West Lewis coastline features an open Atlantic horizon, retains an undeveloped character, and exudes a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would introduce a continuous and dominant industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

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

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

Moreover, the evaluation fails to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment considers these assets in isolation, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

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

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

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

In summary, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage.

These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks lacks the necessary detail to assess likely environmental impacts. The proposal entails significant seabed preparation and installation work in a high-energy Atlantic environment. However, 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 be created after consent, which obstructs any thorough assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns due to the sensitive nature of the receiving environment. The West Lewis coastline hosts clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is impossible to establish the extent, duration, or ecological effects of these impacts. This uncertainty extends to possible effects on marine species and habitats previously recognised as sensitive in the wider assessment.

The lack of detailed emergency response procedures further complicates these issues. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether suitable safeguards are in place to deal with 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, delaying critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and their mitigation must be evaluated prior to consent. When such information is absent, 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 absence of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues hinder a thorough evaluation of construction and pollution risks and reinforce the view 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.

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in terms of sustainable development, as it fails to meet the requirements outlined by statutory duties and national policy. This application echoes the central issues associated with the earlier Lewis Wind Power proposal, which was rejected in 2008 due to its unacceptable level of industrialisation. Although it is now presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these improvements do not resolve the fundamental problems.

A reliable evidential basis for this application is lacking. There are critical gaps in baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures is particularly troubling, as is the failure to consider essential impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete and does not adequately inform on likely significant effects or residual impacts.

In terms of procedural integrity, there are notable failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the omission of a complete Social Impact Assessment is material, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

This proposal is also at odds with National Planning Framework 4. It does not demonstrate sufficient protection for biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide acceptable evidence regarding health and wellbeing impacts, nor does it show a net economic benefit owing to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been assessed properly, thus obscuring potential impacts on peatlands, carbon balance, habitats, and crofting lands.

Uncertainty surrounds the environmental risks associated with this proposal. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, necessitating the application of the precautionary principle and making it impossible to conclude that impacts are acceptable.

There are concerns regarding substantial and irreversible alterations to a highly sensitive landscape as a result of this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption to cultural and visual relationships, along with impacts on tourism, will lead to permanent effects that cannot be adequately mitigated.

In summary, this application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and

unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

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: 74124D5F

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 for consideration under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and its supporting documents, highlighting deficiencies related to planning, environmental issues, cultural significance, and procedural integrity. Located off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical analysis reveals that the application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of key environmental data, while the baseline information provided is both limited and inconsistent. Moreover, many aspects of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, the documentation fails to facilitate a complete or informed understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not substantiated by robust evidence.

Furthermore, there are significant conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially 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. Such conflicts directly affect the statutory tests necessary for consent and impede the competent authority's ability to determine the acceptability of the development from a policy perspective.

The scale of this proposal is unprecedented in the region, with large turbines planned in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual impact, and broader environmental consequences. The collective effect of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance suggests that the application is incomplete and unfit to support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, characterised by gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, resulting in uncertainty regarding the scale and significance of impacts. Specifically, conclusions regarding negligible or non-significant effects are not backed by robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the likely environmental effects of the proposal. The proposal utilises a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, which prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought based heavily on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach means that environmental harm is intended to be addressed at a later stage, thereby obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of key information to post-consent stages is procedurally unacceptable, undermining the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly established prior to determination.

In light of these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a rigorous evaluation of alternatives, failing to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on

environmental impacts, it provides a narrative of project development that does not adequately demonstrate the identification, assessment, and selection of less harmful options over more damaging ones.

The shortcomings are evident in the absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the developer has not sufficiently considered the potential for siting turbines further offshore, which could likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such analysis prevents any conclusion that the proposed siting is the least damaging option available.

These deficiencies also extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or mitigate impacts on sensitive receptors. This oversight includes areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis signals that mitigation by design has not been adequately implemented, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, limiting the competent authority's ability to determine whether more appropriate and less harmful alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal is sustainable or in line with relevant policies.

From a policy standpoint, this inadequacy undermines 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 notable omission, reinforcing the overall conclusion that the application has not undergone sufficient scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is critically flawed and fails to deliver a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data presented is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of the species within it. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

A significant oversight is the inadequate recognition of otters, which are a European Protected Species, as the application does not properly evaluate their use of coastal areas for foraging and movement. The failure to assess their core foraging range and

behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity remain unexamined. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the evaluation of basking sharks, where reliance on aerial surveys leads to 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 utilisation of these waters. The omission of such relevant data contributes to an incomplete baseline, thereby undermining the reliability of the conclusions reached.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions rather than sound evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty regarding the actual scale of risk to marine species and habitats necessitates immediate attention.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The degree of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and lead to the overall determination that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, exhibiting gaps in evidence and inconsistencies that diminish its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Situated within crucial foraging areas and migratory pathways, the proposed development does not adequately assess the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the supporting evidence. The assessment lacks sufficient information to conclude that seabirds

associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling techniques adds a layer of uncertainty, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor introduces a significant risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with 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 findings, combined with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to its internal contradictions, methodological flaws, and insufficient evidence. These shortcomings impede a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites' importance in community life.

The intangible aspects of cultural heritage are also not considered, with the

assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight. Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true 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 serious concern that undermines the integrity of the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap limits both public understanding and the competent authority's ability to assess the potential social risks highlighted by the developer's own research.

Available summaries point to measurable stress, anxiety, and concern among residents, stemming directly from the proposal's scale and proximity. These impacts are substantiated by direct engagement and are therefore not based on speculation. However, the absence of the complete assessment hampers thorough scrutiny of the findings, which in turn restricts the capacity to evaluate their importance in the decision-making process.

Furthermore, there is a perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Despite this recognition, these impacts have not been fully considered within the main application nor given adequate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency has far-reaching 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 robust evidential basis for weighing benefits against potential harm.

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

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

Collectively, the failure to disclose the full Social Impact Assessment, alongside evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted on seascape, landscape, and visual impacts lacks sufficient detail and does not accurately reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create an industrial presence that is both continuous and dominant, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately depict the extent of visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not effectively convey the significance of this impact within such a sensitive landscape context.

Methodological issues also arise concerning how visual viewpoints were chosen and presented. Evidence suggests that some viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding critical cultural heritage sites and valued landscapes. This raises concerns that the visual impact's magnitude may have been understated, which in turn compromises the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are not isolated; they are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment fails to acknowledge this interdependence, leading to an incomplete understanding of the impacts on both their setting and cultural significance.

Industrialising the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This presents not just a visual issue, but also cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resultant change is therefore fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate, lacking the detail necessary to evaluate potential environmental effects. The proposal entails considerable seabed preparation and installation works in a high-energy Atlantic environment. However, the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful evaluation of their effectiveness or sufficiency.

This reliance on unspecified future measures is especially troubling given the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and well-defined 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 intensifies these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are in place to address pollution incidents. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to granting consent, and if this information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance raises significant concerns about whether the proposal can be considered sustainable development.

The assessment of fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the application does not show that these uses and habitats can be protected or maintained without significant disruption.

A key issue is the assumption that fishing activity can be displaced without

repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This is crucial, as displacement could lead to overfishing in other areas and might have wider economic consequences for the local fleet. Without a clear assessment based on evidence, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, substantial risks to marine species are introduced, particularly due to underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over large distances, notably affecting dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application downplays these effects without adequate supporting evidence.

There is also a contradiction within the application, where the requirement for licences to harm European Protected Species is acknowledged while simultaneously stating that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to the extent that legal authorisation is necessary.

The assessment neglects to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be determined.

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 issues prevent a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure fails to account for the full range of impacts associated with this single integrated project. The intrinsic linkage between the offshore turbines and onshore works results in an assessment that is fragmented, thereby obscuring the true scale of environmental and socio-economic effects.

The elements related to onshore development encompass cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the required access infrastructure through sensitive landscapes. Such works necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is notable for being a significant carbon store and an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which inhibits a thorough understanding of the overall environmental footprint of the project.

Furthermore, by omitting or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental

Impact Assessment process mandates that all components of a project be examined collectively; however, the distinct treatment of offshore and onshore elements leads to an incomplete 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 are subject to protective policies. The application does not substantiate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented, leading to an evidential gap regarding biodiversity protection.

Additionally, concerns arise related to carbon balance, as the disturbance of peatland releases stored carbon and may create a carbon debt, which contradicts the objectives of renewable energy development. The application fails to adequately address this matter or to demonstrate that the overall carbon balance remains favourable.

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 processes have been commenced, raising questions about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is at odds with both the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated 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 section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism potential of the area. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment. This aspect has not been assessed in the Environmental Impact Assessment, representing a material omission that undermines the application.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been evaluated. Such an omission is particularly significant given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts results in a considerable gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife, including sensitive

species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are particularly affected by artificial lighting due to phototaxis, leading to disorientation and increased risks of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the resultant increase in mortality, have not been considered.

This shortcoming is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the application does not assess this risk. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

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

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

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

TOURISM

The assessment of tourism impacts in the application is severely lacking, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. The economy of the Isle of Lewis relies heavily on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is noteworthy that 86% of visitors are attracted by the scenery; however, the application does not provide a quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism on the island has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while accounting for up to 16% of the island's economy. Despite this economic significance, the application fails to model the potential impacts that the industrialisation of the seascape and degradation of environmental quality could have on Tourism Gross Value Added and the wider economic resilience of the area. Without such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from an already

established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in enhancing tourism, particularly the importance of unspoiled landscapes and dark skies for visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortfall, creating a significant void in understanding the implications for a recognised and growing segment of the local economy.

Considering the context of an island community with limited economic diversification, the failure to assess tourism impacts raises broader concerns regarding employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity of showing net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the combined failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This gap hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the

Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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 the impacts on tourism represent permanent changes that cannot be mitigated adequately.

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

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

Additional Comments

I was passionately against the AMEC proposal and I am equally opposed to this project too.

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: D7D60D53

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. However, the scale and design of the proposal are unprecedented for this location and raise significant concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and the associated documentation has revealed material planning, environmental, cultural, and procedural deficiencies. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the adoption of a flexible design framework hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures raises additional concerns, as their effectiveness cannot currently be assessed. Consequently, the documentation fails to provide a complete or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not backed by robust evidence.

There exist clear and substantial conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately 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 challenge the competent authority's ability to determine the development's acceptability from a policy standpoint.

Given the proposal's significant scale and the positioning of large turbines in close proximity to the shoreline, concerns surrounding landscape capacity, visual dominance, and overall environmental impact are heightened. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate. It does not offer a clear or trustworthy account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes and layouts, creates considerable uncertainty. This uncertainty hinders a consistent worst-case scenario application and undermines the assessment's integrity. As a result, the potential impacts presented may not accurately reflect the final development, limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

The application depends significantly on mitigation measures and management plans that remain undefined. Seeking consent based on the promise to address environmental harm later prevents a thorough evaluation of these measures' effectiveness and the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's aim, which is to establish significant effects and mitigation clearly before any determination is made.

There are serious evidential shortcomings, including insufficient baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of impacts. Conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot properly determine the application based on the information provided.

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 application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabird species that are already in decline, yet the ornithological assessment provided is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately evaluate the implications of habitat loss, displacement, or collision risk, despite the development being situated within key foraging areas and migratory pathways.

A fundamental contradiction exists in the application, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This approach is only necessary when significant harm is anticipated, which raises serious doubts about the reliability of the assessment. It

suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial importance of these feeding grounds is inadequately addressed, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of the birds are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a significant risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations been adequately considered.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Overall, the inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant deficiency in its assessment of cultural heritage and community identity, treating the West Lewis coastline as a mere collection of static assets rather than recognising it as a vibrant cultural landscape deeply intertwined with environment, language, tradition, and community. This reductive approach fails to acknowledge the ongoing social, cultural, and spiritual significance of heritage sites within the community.

Particularly concerning is the treatment of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites function actively as places of burial and spiritual practice, yet the assessment misrepresents them as unchanging features. By failing to consider their continued use and meaning, the evaluation neglects the essential impact of development on their setting, leading to an incomplete understanding of cultural effects and a disregard for their integral role in community

life.

The application also neglects the assessment of intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the longstanding relationship between the community and its coastal environment. Such elements are vital to the area's identity and their absence from the assessment represents a serious oversight. Without addressing these factors, the true cultural impact of the proposed development remains obscured.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, which embodies distinct 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, contravening established principles of participation in cultural and environmental decision-making.

Moreover, a critical procedural lapse is evident in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents 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 clear conflict with National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a marked deviation from policy expectations.

In summary, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application falls short in providing a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified in the developer's own research.

Summaries that are currently accessible reveal that residents are experiencing tangible levels of stress, anxiety, and concern as a result of the proposal's scale and proximity. These findings stem from direct community engagement and are therefore based on concrete evidence rather than speculation. The failure to release the full assessment

limits scrutiny and restricts the capacity to evaluate the significance of these issues in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with the term "cultural loss" arising in the developer's findings. Yet, these implications have not been adequately reflected in the primary application, nor given the appropriate consideration they warrant. Withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is crucial for developments of this magnitude, especially when community character and functionality are at stake. The lack of the complete dataset means the application does not provide a thorough evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application fails to show alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid detriment; however, the available evidence suggests that there are existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy is not possible.

The procedural consequences are significant. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

When taken together, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

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.

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 application regarding the project is fundamentally flawed, as it does not provide a complete assessment of onshore infrastructure. The offshore turbines are closely

connected to the onshore works, yet these elements have been evaluated separately. This fragmented approach masks the true extent of the environmental and socio-economic impacts that this integrated project will have.

Key onshore components involve extensive cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes that traverse sensitive landscapes. Excavation activities are set to occur across deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological importance. The lack of a thorough assessment regarding these impacts results in an incomplete understanding of the project's overall environmental footprint.

Crucially, the omission or postponement of onshore impact assessments obstructs the ability to fully evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined collectively. However, the current separation of offshore and onshore elements leaves a gap in understanding the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are designated for protection under policy frameworks. The application fails to convincingly demonstrate that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential shortfall concerning biodiversity protection.

Concerns are also raised regarding the carbon balance involved in this proposal. Disturbance of peatland areas leads to the release of stored carbon, potentially resulting in a carbon debt that counters the goals of renewable energy advancement. The application inadequately addresses this critical issue or provides assurance that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, leading to uncertainty about the project's feasibility and lawful execution.

From a policy standpoint, the failure to assess the project as a cohesive entity and demonstrate the protection of 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 weakens the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable. This situation precludes a lawful determination of the project.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant shortcoming. The proposed development along the West Lewis coastline introduces permanent red aviation lighting, which is visible over extensive distances and creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally impacts the night-time environment, which is characterised by exceptionally dark skies that contribute to the area's environmental quality, cultural identity, and tourism value.

Moreover, the application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical role of dark skies in the region's identity and the emerging sector of astro-tourism, this oversight is particularly concerning. The absence of such assessments indicates a notable gap in the overall evaluation of landscape and environmental impacts.

Importantly, there is no consideration of how artificial lighting affects nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which may cause disorientation and elevate collision risks. The application does not include a lighting impact assessment or a phototaxis study, thereby neglecting potential effects on these species and their mortality rates.

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to reflect nocturnal activities and associated hazards. Additionally, species like Kittiwakes, known to forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical deficit in understanding the ecological impacts.

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

From a policy standpoint, the omission stands in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, given that night-time character is an essential component of the environment.

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

TOURISM

The application presents a concerning inadequacy in assessing tourism impacts, neglecting to consider the economic and social repercussions for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential to tourism, which is heavily reliant on these natural attributes. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative assessment on how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, making up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect the Tourism Gross Value Added or the broader economic resilience. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in sustaining tourism, especially the significance of unspoiled landscapes and dark skies to visitor experience, alongside emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

For a community on an island with limited economic diversification, the neglect to evaluate 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 properly examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and acknowledging the island's economic dependency lead to a significant gap in evidence. This hinders a thorough evaluation of economic effects and supports the view that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development, as evaluated against statutory duties, national policy, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of

industrialisation was deemed unacceptable. Now, it is being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant deficiencies in the evidential basis provided for the determination of the application. The baseline data is incomplete, and there remains an undefined design envelope. It relies on unspecified mitigation measures and omits crucial impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a full understanding of the likely significant effects or residual impacts.

Additionally, procedural errors are apparent. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the complete Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4, failing to ensure the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of informational deficiencies, alongside conflicts with policy and unresolved environmental risks, inhibits a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or implement relevant regulatory provisions to necessitate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E27D3E65

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal 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 a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

There are evident and serious conflicts with policy. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy perspective.

The scale of this proposal is unprecedented for the location, with large turbines planned in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, failing to offer a comprehensive, transparent, or dependable account of the potential environmental consequences of the proposal. The flexible Project Design Envelope, which lacks concrete commitments regarding turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity undermines the integrity of the assessment process, resulting in a presentation of impacts that may not accurately represent the final development. Consequently, both the public and the competent authority are left without a clear understanding of the true environmental effects.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be mitigated at a later stage, the application precludes any meaningful evaluation of the proposed measures' effectiveness or a proper assessment of residual impacts. This deferral of essential information to post-consent stages contravenes the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and their mitigations are clearly outlined prior to decision-making.

Evidential deficiencies abound, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps lead to uncertainties concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are put forth without solid supporting data. This insufficiency of information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential requirements under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly with respect to protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it does not substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and significant gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives presented in the application is insufficient and does not fulfil the requirements of the Environmental Impact Assessment. Instead of offering a structured and reasoned comparison of viable alternatives based on environmental

impacts, the application merely recounts the project's development history. This method does not establish that less harmful options have been effectively identified, evaluated, and chosen over more damaging alternatives.

There is a lack of transparent and evidence-based comparisons of different offshore locations, development sizes, or design configurations. Notably, the application fails to show that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would probably be less severe. The sensitive nature of the West Lewis coastline and the critical significance of proximity to the shore in assessing impact highlight the failure to analyse these options, preventing any conclusion that the proposed site is the least damaging one.

This inadequacy also affects cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been thoroughly investigated 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 suggest that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through site selection, layout, and routing of infrastructure. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to determine if there are less harmful and more suitable alternatives available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or complies with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot receive a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is inadequate and does not deliver a thorough or trustworthy understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically rich. However, the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a strong evidential basis for evaluating potential impacts.

One significant oversight is the treatment of otters, a species protected under European law. The application does not adequately acknowledge or assess their active use of the coastal areas for foraging and movement. This absence of consideration regarding their core foraging range and behavioural patterns means that the potential impacts of

construction disturbances, noise, and increased human activity have not been sufficiently evaluated. This flaw undermines any assertions about the absence of significant effects on otters.

Deficiencies also appear in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This is particularly evident when compared to well-established land-based observations that highlight frequent use of these waters. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on solid 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 raises questions about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment process and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that it cannot be confidently claimed that adverse effects are excluded beyond reasonable scientific doubt, which invokes the precautionary principle. Thus, consent cannot be lawfully granted in these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues inhibit a robust evaluation of the 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 for the proposed development lacks the evidential rigor necessary to conclude that there will be no adverse effects on protected sites. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. However, the assessment fails to adequately demonstrate that these species will remain unaffected. Furthermore, the siting of turbines within a recognised migratory corridor poses an additional and substantial risk, as it potentially obstructs a primary flight path for species migrating between the United Kingdom and Iceland. The implications of sustained mortality within this corridor have not been sufficiently evaluated.

A critical inconsistency within the application arises from the developer's assertion of no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is required only when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that the conclusions drawn

are not substantiated by the supporting evidence. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The assessment does not sufficiently consider the importance of key feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda, and the reliance on modelling approaches introduces further uncertainty.

From a regulatory standpoint, the assessment does not meet the evidential threshold needed to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, which precludes a lawful conclusion in favour of consent. Additionally, the deficiencies highlighted reflect non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In conclusion, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidential support. These flaws hinder a robust evaluation of potential impacts and contribute to the overall determination that the application does not satisfy the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape that integrates environment, language, tradition, and community. The application takes a narrow view, treating heritage merely as a collection of disconnected, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static features. This oversight neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their importance in community life.

Additionally, the assessment fails to incorporate intangible cultural heritage elements, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. Such aspects are crucial to the area's identity but are completely omitted from the evaluation, which represents a major gap. Without including these factors, the cultural impacts of the development remain inadequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, identifiable as an Indigenous People, yet no Free, Prior and Informed Consent process has taken place. The lack of meaningful engagement compromises the credibility of the assessment and does not align with accepted principles for participation in decisions affecting cultural and environmental interests.

Moreover, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone hampers a lawful determination.

From a policy standpoint, the deficiencies identified create a direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to assess both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear departure from policy stipulations.

Collectively, the oversight in evaluating living heritage, intangible cultural values, community rights, and legal obligations culminates in a notable evidential gap. The cultural impacts stemming from the development have not been thoroughly examined, and the application falls short of providing an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is a serious concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been released. This creates a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks identified through the developer's research.

Available summaries show that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, as "cultural loss" has been highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the necessary consideration. 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. A thorough understanding of the social, economic, and health impacts is crucial for developments of this size, especially when community character and functioning are at stake. By withholding the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing negative effects that have not been fully reported. Without the full assessment, compliance with this policy remains unproven.

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

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

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 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 application presents significant deficiencies in its assessment of marine life and fisheries, failing to offer a comprehensive analysis of ecological and socio-economic impacts. Key concerns centre around the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a vital fishing industry. The proposal does not convincingly demonstrate that these habitats and activities can be preserved without substantial disruption.

A major flaw is the presumption that fishing operations can be easily displaced without repercussions. The application does not provide any evidence that alternative fishing areas exist or are accessible, nor that they can handle increased pressure. This gap is critical, as displacing fishing efforts could lead to overfishing in other locations and may also have broader economic implications for the local fishing fleet. The lack of a detailed, evidence-based assessment obscures the understanding of potential impacts on fisheries and livelihoods.

Further risks to marine species arise from the construction activities, notably the high-energy hammer piling, which is expected to generate significant underwater noise. Such disturbance is anticipated to reach considerable distances, potentially impacting local populations of species such as dolphins. The predicted disturbance to a large segment of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting data.

There is a troubling inconsistency within the application where it acknowledges the necessity for licenses to inflict harm on European Protected Species while simultaneously characterising impacts as negligible. This contradiction calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially in contexts where anticipated harm necessitates legal authorization.

Additionally, the assessment overlooks the cumulative effects of various pressures, including habitat disturbance, noise pollution, and the displacement of fishing

activities. Without a thorough evaluation of these combined factors, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate conformity with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or prevent significant negative impacts on marine biodiversity, thereby obstructing any assertion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment collectively render it incomplete and unreliable. These shortcomings hinder a proper evaluation of the potential consequences for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to address the full extent of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are inextricably linked, yet they have been evaluated separately, leading to a fragmented analysis that obscures the true scale of both environmental and socio-economic effects.

Included among the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The assessment does not comprehensively evaluate these impacts, thus hindering a complete understanding of the project's environmental footprint.

Furthermore, the application's exclusion or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together, yet the delineation between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application fails to demonstrate that a thorough assessment of these habitats has been conducted or that suitable avoidance measures have been instituted, thus revealing a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with existing land use and legal rights. The absence of evidence indicating that the requisite consents or processes have been initiated brings

into question 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 is in conflict with both the National Marine Plan and National Planning Framework 4. The lack of evidence supporting the avoidance or mitigation of impacts further undermines the application.

In summary, the segmentation of project components, coupled with the absence of a thorough assessment and insufficient evidence regarding environmental and land use impacts, renders this portion of the application incomplete and unreliable, obstructing 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 inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and burgeoning 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 for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It also runs counter to strategic objectives that

prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the deficiencies 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 shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents significant shortcomings in its adherence to the principles of sustainable development, particularly when evaluated against statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, it still fails to meet essential requirements.

Crucial gaps in baseline data are evident, along with an undefined design envelope, and there is an overreliance on unspecified mitigation measures. Additionally, key impact pathways related to nocturnal wildlife, complete onshore infrastructure, and tourism effects have been overlooked. The Environmental Impact Assessment is therefore inadequate, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, procedural deficiencies are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. It also fails to ensure 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 offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain ambiguous and may be substantial. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their findings. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion about the acceptability of impacts.

The proposal threatens to bring about profound and irreversible changes to a 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 enduring impacts that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstructs a lawful and evidence-based decision. The competent authority must either reject this application outright or invoke regulatory provisions to demand the submission of the missing information.

Consequently, it is formally requested 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: F74FFE61

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The existing documentation highlights significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural identity. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and the principles of sustainable development.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report contains substantial deficiencies and does not deliver a comprehensive, clear, or dependable account of the potential environmental effects stemming from the proposal. A critical issue arises from the employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. Consequently, the impacts detailed may not accurately reflect the development ultimately built, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed at a later stage, which hinders any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and at odds with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations be clearly established before determination.

Additionally, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned comparison of viable alternatives based on their environmental impacts, the application provides a

narrative that recounts the evolution of the project. This method does not sufficiently demonstrate that less harmful options have been appropriately identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has genuinely considered the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in determining impact, the failure to conduct such analysis inhibits any conclusion that the proposed siting is the least damaging option available.

These inadequacies also affect the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, suggests that there has been no application of mitigation by design, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives exist. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding the cultural heritage and community identity of the West Lewis coastline is fundamentally deficient. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are intricately connected. The application adopts a simplistic view, treating heritage merely as isolated and static assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and

spiritual sites, yet the assessment incorrectly categorises them as static features. This oversight neglects their continued use and meaning, as well as the implications of development on their surroundings. Consequently, this misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their essential role in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and traditions, nor the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity and are completely overlooked, which constitutes a significant omission. Without taking these factors into account, the cultural impact of the proposed development cannot be accurately gauged.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which possesses a unique cultural identity with characteristics of an Indigenous People. However, the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the legitimacy of the assessment and disregards established principles of participation in decisions impacting cultural and environmental interests.

Moreover, a critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside living cultural practices, clearly deviates from established policy requirements.

In summary, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a robust foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, resulting in a significant evidential gap that hinders the public and the competent authority from grasping the complete extent of social risks identified by the developer's research. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the lack of transparency around the full report obstructs proper scrutiny of its findings.

Available summaries reveal that residents are experiencing measurable stress, anxiety,

and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are thus grounded in reality, not speculation. However, the inability to review the full assessment limits the capacity to evaluate the significance of these effects in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with indications of “cultural loss” highlighted in the developer’s own findings. Nevertheless, these adverse impacts have not been adequately integrated into the main application, which is a serious oversight. The non-disclosure of the comprehensive Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning are at stake. The application fails to provide a complete evidential basis for assessing the balance between benefits and potential harm, largely due to the absence of the full dataset.

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

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material gap in the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the combination of the withheld full Social Impact Assessment and evidence of existing negative impacts renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and underscores the inadequacy of information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its expansive Atlantic horizon and an undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a continuous industrial presence that fundamentally alters this unique character, leading to an irreversible transformation of the landscape. The application fails to adequately convey the magnitude of this visual change. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, impacting visual amenity and diminishing the inherent qualities of naturalness and remoteness.

Concerns arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests these viewpoints may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which in turn undermines the assessment's reliability.

Moreover, the application does not consider the interconnectedness of landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities fails to recognise their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance. The introduction of industrial elements to 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 merely a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align 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 weakens any assertion of compliance with policy.

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

In summary, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail, failing to provide the necessary information to evaluate potential environmental impacts. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be established after consent. This approach inhibits any meaningful assessment of their adequacy or effectiveness.

There is particular concern over this reliance on undefined future measures, especially

considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats, both of which are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Moreover, uncertainties exist regarding the scale and behaviour of sediment plumes generated 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 encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until post-consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capability 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 by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and when such information is absent, a lawful determination cannot be achieved. The application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts results in a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of both ecological and socio-economic impacts, particularly concerning fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal fails to ensure the protection and maintenance of these essential habitats and uses without significant disruption.

A critical flaw is the assumption that fishing activities can be displaced without any consequences. There is no evidence presented that alternative fishing grounds are available or capable of supporting additional pressure, which is a significant oversight. This gap in evidence raises serious concerns about the potential for overfishing in other areas and the economic implications this could have for the local fishing fleet. The absence of a clear, evidence-based assessment means that the impacts on fisheries and the livelihoods that depend on them remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise created during construction. The high-energy hammer piling expected to occur over an extended period is likely to disturb marine life across vast distances, including species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is alarming, yet the application minimizes these significant effects without adequate supporting evidence.

Inconsistencies within the application further undermine its credibility, particularly when it acknowledges the need for licenses to permit harm to European Protected Species while concurrently describing the impacts as negligible. This contradiction raises doubts about compliance with the Habitats Regulations, especially given that harm is expected to a level that requires legal authorization.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment that fails to consider the full impacts of what is essentially a single integrated project. The offshore turbines are directly linked to the onshore works, yet the separation in their evaluation obscures the true scale of the environmental and socio-economic effects.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. These constructions involve the excavation of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application does not adequately assess these impacts, which hinders a complete understanding of the project's overall environmental footprint.

The failure to assess onshore impacts either thoroughly or at all prevents a proper evaluation of cumulative effects. According to the Environmental Impact Assessment

process, all project components must be considered collectively; however, by treating offshore and onshore elements as distinct, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Sensitive habitats such as machair systems and peatland environments, which are subject to policy protection, face significant risks from this proposal. There is no evidence presented that these impacts have been fully considered or that appropriate avoidance measures have been implemented, leading to a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland could release stored carbon, creating a potential carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance will remain beneficial.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or procedures have been initiated, which raises serious questions about the feasibility and legal compliance of the implementation.

From a policy standpoint, the lack of a comprehensive assessment of the project, particularly regarding the protection of peatlands, habitats, and land use interests, is in conflict with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's reliability.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly overlooks the assessment of nocturnal wildlife and dark skies, which represents a critical gap in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, an essential aspect of environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect that would drastically change the night-time environment.

Furthermore, there is a notable lack of evaluation regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This omission is particularly concerning, given the significance of dark skies to the region's identity and the growth of emerging sectors such as astro-tourism. The absence of consideration for these impacts leads to a substantial deficiency in the overall landscape and environmental assessment.

Equally alarming is the failure to assess the effects on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, resulting in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study in the application fails to address how the proposed aviation lighting could affect these species or raise mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related dangers. Kittiwakes, for instance, are known to forage and migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a vital shortcoming in the understanding of ecological impacts.

In the absence of a nocturnal impact assessment, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and impeding a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and the quality of the environment. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time forms a crucial component of the environment.

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

TOURISM

The assessment of the proposed development lacks essential detail regarding its potential impacts on tourism, a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. This lack of analysis leaves uncertainty as to whether the development would yield a net economic benefit or adversely affect an already thriving sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism are also not addressed. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impacts on a vital segment of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts poses broader consequences for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the need to establish net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic reliance result in a substantial evidential void. This gap hinders a thorough assessment of the economic consequences and contributes to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, especially when evaluated against statutory duties, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Presenting the project now under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

There are significant gaps in the baseline data, and the application relies on an undefined design envelope, which raises questions about the reliability of the evidential basis for determination. The proposed mitigation measures remain unspecified, while crucial impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism effects—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are evident failings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a

significant omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Furthermore, the proposal stands in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural areas, or cultural heritage. There is no evidence of acceptable health and wellbeing impacts, and the absence of tourism impact modelling fails to provide proof of a net economic benefit. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

Additionally, the project 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 are permanent effects that cannot be adequately mitigated.

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

For these reasons, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

As an Island resident I am totally opposed to this development, which will destroy so much of our Island both on land and visually offshore. A pause needs to be put on all these new windfarm development for proper consultation with the communities most affected by them. At present there is not joined up thinking, or the infrastructure in place to accommodate new wind farm schemes and certainly not one of this massive scale that will have such far reaching consequences.

These developments are an anathema to the affected communities here in the Western Isles who will see their landscape, culture and history completely eroded while still being forced to pay amongst the highest energy prices in Europe. While we appreciate that more needs to be done to combat climate change, these windfarm schemes need to be located closer to the centres of need – England, rather than in remote and fragile

areas of Scotland, where we already produce sufficient energy to meet the needs of our population.

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: 1A03961C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has revealed numerous deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance.

The location of the proposal is significant, situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. The unprecedented scale of the project raises serious questions about its compatibility with statutory requirements and national policy, as well as its adherence to the principles of sustainable development. The positioning of large turbines near the shoreline poses significant concerns regarding their visual impact, landscape capacity, and overall environmental consequences.

The application lacks a robust evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal. The reliance on a flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures hinder any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by adequate evidence.

Moreover, there are substantial policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, particularly in areas concerning biodiversity, natural habitats, cultural heritage, and community health and wellbeing. The application does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, address climate change, or uphold environmental integrity. Such discrepancies are critical, as they directly affect the statutory tests needed for consent, undermining the capacity of the competent authority to deem the development acceptable from a policy standpoint.

In light of the considerable absence of information, reliance on vague mitigation strategies, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot sustain a lawful determination. In these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not reliably account for the potential environmental effects of the proposal. A flexible Project Design Envelope is employed without any commitment to specific turbine dimensions or layouts, creating significant uncertainty. This uncertainty hinders a proper application of a worst-case scenario analysis. As a result, the assessment's integrity is compromised, leading to impacts that may not accurately represent the development that will ultimately be constructed. This lack of clarity prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the basis that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness and leaves residual impacts unassessed. Deferring essential information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires that likely significant effects and mitigation be clearly established before a determination is made.

There are notable gaps in the evidence presented, including insufficient baseline data and methodological limitations. The application also relies on assumptions rather than site-specific evidence. This introduces uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that appropriate safeguards are established for biodiversity protection and environmental integrity.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data leads to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured comparison of realistic alternatives based on their environmental effects, the application offers a narrative of project development. This method does not adequately show that less harmful options have been properly

identified and assessed in preference to more damaging solutions.

There is a lack of transparent and evidence-based comparisons of offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in determining impact, the failure to conduct such an analysis prevents any conclusion that the proposed siting is the least damaging option available.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes important cultural and spiritual sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that there has been no application of mitigation by design, relying instead 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, leaving the competent authority unable to determine whether less harmful and more suitable alternatives exist. Without a thorough alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to offer a thorough and dependable understanding of the ecological receptors present. This region is recognised as a highly sensitive and biologically vibrant marine system; however, the baseline data available is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species, leading to an assessment that lacks a solid evidential basis for evaluating potential impacts.

A significant shortcoming within the application pertains to otters, classified as a European Protected Species. There is insufficient recognition and evaluation of their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to appropriately assess the potential effects of construction disturbance, noise, and increased activity, thereby undermining any conclusions regarding the absence of significant impacts on this species.

Moreover, the assessment of basking sharks is similarly deficient, as it relies heavily on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent usage of these waters. The lack of incorporation or proper consideration of such relevant data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

Due to these methodological inadequacies, the conclusions regarding negligible or non-significant effects are grounded in assumptions rather than solid evidence. The deficiency of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, this engenders uncertainty concerning the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has failed to properly identify or assess the protected species involved. The resulting uncertainty precludes the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, the granting of consent cannot be lawfully justified.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These shortcomings inhibit a rigorous evaluation of the impacts on marine ecology and protected species, ultimately contributing to the overarching determination that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in the ornithological assessment, marked by notable evidence gaps and internal inconsistencies that compromise its conclusions. Located within key foraging areas and migratory pathways, the development on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline, fails to convincingly demonstrate that these species will not face adverse effects. The assessment inadequately evaluates the risks of displacement, collision, and habitat loss, which are critical factors for these vulnerable populations.

A glaring contradiction exists within the application; while the developer asserts that there are no significant adverse effects, it concurrently puts forth a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn lack sufficient backing from the available evidence. Furthermore, the assessment does not adequately substantiate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will

remain unaffected, failing to consider the significance of these feeding grounds fully.

The methodologies employed are likely to underestimate potential mortality rates, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. This introduces uncertainty given that the baseline data is often incomplete and the behavioural responses of these birds are not fully understood. Additionally, the siting of turbines within a recognised migratory corridor poses a considerable risk, effectively creating an obstruction in a primary flight path for species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species with small global populations.

Regulatory requirements have not been met, as the application fails to provide the necessary evidence to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the evidential standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which hampers any lawful conclusion that might support consent.

Moreover, the identified deficiencies represent a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted directly conflicts with national policy. Altogether, the assessment's unreliability, stemming from methodological weaknesses and insufficient evidence, undermines any robust evaluation of potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious

oversight. Without these considerations, the true cultural impact of the development remains unexamined.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This proposal would create a continuous and dominant industrial presence that fundamentally alters the existing character, leading to a permanent and irreversible transformation of the landscape. The assessment provided does not adequately represent the scale of this visual change, which would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and diminish the defining qualities of naturalness and remoteness, yet the assessment fails to convey the true level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the assessment may have understated the magnitude of visual impact, thereby undermining its reliability.

Moreover, the assessment does not properly consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape,

visually and spatially linked to the Atlantic horizon. Treating these heritage assets as isolated entities fails to acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon. This represents a broader cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of the proposed changes contradicts the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks related to construction and pollution is lacking and does not include the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation activities in a high-energy Atlantic setting, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be prepared after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependence on unspecified future measures raises particular concerns, especially considering the sensitivity of the environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it lacks adequate information on how these issues will be prevented, controlled, or monitored.

There is also ambiguity about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already

recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the demands of the Environmental Impact Assessment regime. It is necessary to evaluate likely significant effects and mitigation before consent, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to show compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the view that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is crucial in understanding the full scope of impacts stemming from what constitutes a singular integrated project. The offshore turbines and the onshore components are inherently interconnected; however, their separate evaluations lead to a disjointed analysis that obscures the comprehensive environmental and socio-economic repercussions.

The elements of the onshore works comprise cabling across areas of protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure traversing sensitive landscapes. These activities entail excavation in regions of deep peat, particularly within Barvas Moor, recognised as a significant carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, which impedes a complete understanding of the environmental footprint of the project.

The assessment deficiencies extend to cumulative effects, as the exclusion or postponement of onshore impact evaluations obstructs an accurate appraisal of overall consequences. The Environmental Impact Assessment process mandates that all project components be evaluated collectively; thus, the fragmented analysis of offshore and onshore elements results in an incomplete understanding of the collective impacts on peatlands, habitats, and local communities.

Additionally, there are notable risks associated with sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not sufficiently establish that the impacts on these vital habitats have been fully evaluated or that suitable avoidance measures are in place. This creates a substantial evidential gap in relation to biodiversity protection.

Concerns also arise regarding carbon balance, as disturbance of peatland leads to the

release of stored carbon, potentially resulting in a carbon debt that contradicts renewable energy development objectives. The application inadequately addresses this critical issue or demonstrates that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land further complicates matters, introducing potential conflicts with existing land use and legal rights. The application does not furnish evidence that the requisite consents or processes have been initiated, thereby raising concerns about the project's deliverability and lawful execution.

From a policy standpoint, the division of project assessments and the failure to demonstrate adequate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife stands out as a critical shortfall in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the overall experience of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the region's identity and the emerging tourism sector focused on astro-tourism. As a result, the assessment presents a stark gap in the overall evaluation of the landscape and environmental effects.

The lack of evaluation extends to nocturnal wildlife, with no assessment provided for species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to artificial lighting. This failure to address the potential risks, including disorientation and increased mortality due to collision, is troubling. Furthermore, the ornithological assessment's dependence on daytime survey data fails to account for nocturnal activities and the associated dangers. Species like Kittiwakes, which may forage or migrate at night, remain vulnerable to disorientation from artificial lighting, yet this risk has gone unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological implications.

Without a proper assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard, which would exclude adverse effects beyond reasonable scientific doubt, cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions clash with National Planning Framework 4, particularly concerning the safeguarding of natural areas and the quality of the environment. Additionally, this neglect undermines the broader analysis of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Collectively, the absence of any evaluation related to dark skies and nocturnal wildlife signifies a substantial 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 assessment related to tourism impacts is notably lacking and does not adequately address the economic and social implications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide any quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, while supporting over 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and the resultant loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis leaves it unclear whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment neglects to consider the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging niches such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential effects on an increasingly recognised segment of the local economy.

Given that the island community has limited economic diversification, the disregard for tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a comprehensive Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It stands in conflict with strategic goals that prioritise tourism as a vital growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency culminate in a substantial evidential void. This significantly hampers a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It echoes the issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a comprehensive evidential basis for decision-making.

There are significant gaps in the baseline data, an undefined design envelope is used, unspecified mitigation measures are relied upon, and crucial impact pathways are omitted. These include considerations for nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not sufficiently demonstrate protection of biodiversity, natural places, and cultural heritage. It fails to indicate acceptable health and wellbeing impacts and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to rule out

adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion about the acceptability of impacts.

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

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

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

Additional Comments

I am a regular tourist to the Outer Hebrides and i adore these islands. I have friends who live on the west coast of Harris and Lewis who will be directly affected by these massive turbines.

I object 100% to this wind farm being erected so close to the land.
Also the energy isn't even going to go to the islanders.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 341A8717

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

Dear Sir/Madam

I am writing to formally object to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. This objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. This development, situated off the west side of the Isle of Lewis, is within an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, coupled with its proximity to the shoreline, raises substantial concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful decision. It is evident that critical environmental data is absent, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the reliance on a flexible design framework obstructs a clear understanding of potential significant effects. Moreover, the mitigation measures mentioned are not clearly outlined, rendering any assessment of their effectiveness impossible. Consequently, the provided documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are notable and serious policy conflicts inherent in the proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate its compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability within policy frameworks.

The unprecedented scale of this proposal introduces significant apprehensions regarding landscape capacity, visual dominance, and environmental consequences. Large turbines positioned in close proximity to the shoreline amplify these concerns. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and incapable of sustaining a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a complete, transparent, or reliable evaluation of the proposal's likely environmental impacts. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and makes it impossible to consistently apply a worst-case scenario, thus obscuring the true extent of environmental effects and hindering both public understanding and the competent authority's ability to make informed decisions.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed later obstructs any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This postponement of critical information until post-consent stages is procedurally unacceptable and contradicts the aim of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly identified before determination.

The application also suffers from considerable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of the impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The deficiency of sufficient 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 meet the evidential standards required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate compliance with the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of alternatives. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, the application offers a narrative regarding project evolution. This approach does not substantiate that less harmful options have been

properly identified, assessed, and selected over more damaging alternatives.

Moreover, there is a lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the option of placing turbines further offshore, an action that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the failure to conduct such an analysis precludes any determination that the proposed siting represents the least damaging option.

This inadequacy further extends to cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas 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 adequately applied, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This deficiency signifies a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives may exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortfall undermines adherence to the National Planning Framework 4, particularly in its aims to protect natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species within the West Lewis coastal environment is severely lacking. This area is a biologically active and sensitive marine system, yet the baseline data presented is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a reliable evidential basis for evaluating potential impacts.

Notably, there is a significant omission regarding otters, classified as a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. This oversight, which neglects their core foraging range and behavioural patterns, means that the possible effects of construction disturbance, noise, and increased activity have not been sufficiently

assessed. This gap undermines the conclusions drawn about the absence of significant effects on this species.

There are further shortcomings in the evaluation of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in the 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 reached.

The methodological limitations identified suggest that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of comprehensive baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or assess protected species adequately. The uncertainty generated hinders the possibility of excluding adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

Moreover, the application presents a fundamental contradiction: while the developer asserts there will be no significant adverse effects, they simultaneously present a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack robust support from the evidence provided.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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 developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries highlight that residents are already experiencing measurable levels of 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. Yet, without the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" noted within the developer's findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The lack of access to the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning may be jeopardised. The failure to provide the complete dataset means the application lacks a comprehensive evidential basis for weighing the benefits against potential 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 avoid adverse impacts; however, the existing evidence reveals harmful effects that remain undisclosed. Without the full assessment, it cannot be established that the application aligns with this policy.

The procedural implications of these omissions are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a critical shortfall in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not sufficiently substantiated.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This initiative would result in a significant industrial presence that fundamentally alters the existing character of the landscape, leading to a permanent and irreversible transformation. The application fails to accurately represent the magnitude of the visual change, as the scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Consequently, this would adversely affect visual amenity, undermining the qualities of naturalness and remoteness that currently define the area.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, compromising the reliability of its findings. Furthermore, the interconnected relationship between seascape, landscape, and cultural heritage has not been properly assessed. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are linked to the wider landscape through visual and spatial relationships with the Atlantic horizon. 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 would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately considered in the application. From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a robust worst-case assessment further undermines any claims of compliance with policy requirements.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are therefore fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation strategies. Collectively, these deficiencies in the assessment prevent a reliable evaluation of the proposal's impacts, reinforcing the conclusion that it is incompatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

Further uncertainty exists 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 consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application

obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also 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 is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and pollution risks is not feasible, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected from significant disruption. The assessment of fisheries and marine life is inadequate and fails to provide a thorough evaluation of the ecological and socio-economic impacts involved.

A critical issue arises from the assumption that fishing activity can simply be displaced without consequence. The application lacks evidence to support the availability and accessibility of alternative fishing grounds, as well as their ability to handle increased pressure. This absence of information is particularly concerning, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, notably through underwater noise generated during construction. The use of high-energy hammer piling for extended periods is expected to disturb marine life across large distances, notably affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population presents serious concerns, yet the application downplays these effects, lacking adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction raises doubts about compliance with the Habitats Regulations, particularly given the anticipated harm that would necessitate legal authorisation.

Additionally, the assessment overlooks cumulative impacts resulting 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 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, thus preventing any determination that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is fundamentally flawed and fails to capture the full range of impacts from what constitutes a single, integrated initiative. The offshore turbines are closely linked to the onshore works, yet these elements are assessed in isolation. This disjointed analysis obscures the true scale of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access routes through sensitive landscapes. Significant excavation across deep peat areas, especially within Barvas Moor, which serves as an important carbon store and ecologically fragile habitat, is also part of these works. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the project's overall environmental footprint.

The omission of onshore impact assessments prevents an accurate evaluation of cumulative effects. According to the Environmental Impact Assessment process, all elements of a project should be examined collectively. However, the distinct separation of offshore and onshore aspects leads to a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The proposal does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented, resulting in a clear evidential void concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide proof

that the requisite consents or processes are underway, which calls into question the feasibility and lawful execution of the project.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to show protection for peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to confirm that impacts can be avoided or mitigated further weakens the application.

In summary, the fragmented assessment of project components, the absence of a comprehensive evaluation, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and untrustworthy, ultimately 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 attracted by the area's scenery. However, it fails to provide a quantified analysis of how large-scale offshore infrastructure could potentially affect visitor numbers, their behaviour, or the overall economic contribution of tourism, which is a key sector of the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this, the application does not model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the community.

The assessment neglects to address the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies cannot be overstated, especially in relation to visitor experience and emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on these important aspects of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the obligation to provide evidence of net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for competent authorities to assess the economic consequences of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development, as evaluated against statutory duties,

national policy, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant deficiencies in the evidential basis provided for the determination of the application. The baseline data is incomplete, and there remains an undefined design envelope. It relies on unspecified mitigation measures and omits crucial impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a full understanding of the likely significant effects or residual impacts.

Additionally, procedural errors are apparent. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the complete Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4, failing to ensure the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of informational deficiencies, alongside conflicts with policy and unresolved environmental risks, inhibits a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or implement relevant regulatory provisions to necessitate 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

The impact of this is not just what is seen and heard but what it will do without us feeling it. The whole area will be impacted and if Ireland has objected then so must we. Would those actively for this want this to happen to their home, community and landscape?

Yes there is a need for renewables to be part of the country future however not on this scale.

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: 0B6C7A6B

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 is based on a review of the Environmental Impact Assessment Report and related documentation, which highlights significant planning, environmental, cultural, and procedural shortcomings. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The size, location, and design of the project raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful decision. There is a lack of critical environmental data, and the baseline information is inconsistent and limited. Important elements of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of potential significant effects, while the use of unspecified mitigation measures makes it impossible to evaluate 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 lack solid evidence.

There are notable and substantial policy inconsistencies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies challenge the statutory tests needed for consent and weaken the capacity of the competent authority to affirm that the development is acceptable according to policy.

The scale of the proposal is unprecedented for this area, featuring large turbines close to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy conflicts, it is clear that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on undefined project parameters creates a situation fraught with uncertainty, undermining the credibility of the Environmental Impact Assessment Report. Without specific turbine dimensions, layouts, or configurations, it is impossible

to apply a consistent worst-case scenario, leaving significant gaps in understanding the potential environmental effects of the development. This lack of commitment to detail prevents both the public and the competent authority from grasping the true extent of the impacts, which is vital for informed decision-making.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is fundamentally flawed and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of realistic alternatives with respect to environmental effects, the application merely recounts the evolution of the project. This narrative fails to prove that less harmful options have been thoroughly identified, assessed, and preferred over more damaging solutions.

Moreover, there is a 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. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been sufficiently explored to avoid or mitigate impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been reduced through thoughtful site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy perspective, this deficiency compromises adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material oversight that supports the overall conclusion that the application lacks adequate evaluation and cannot justifiably receive a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to offer a thorough and dependable understanding of the ecological receptors present. This region is recognised as a highly sensitive and biologically vibrant marine system; however, the baseline data available is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species, leading to an assessment that lacks a solid evidential basis for evaluating potential impacts.

A significant shortcoming within the application pertains to otters, classified as a European Protected Species. There is insufficient recognition and evaluation of their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to appropriately assess the potential effects of construction disturbance, noise, and increased activity, thereby undermining any conclusions regarding the absence of significant impacts on this species.

Moreover, the assessment of basking sharks is similarly deficient, as it relies heavily on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent usage of these waters. The lack of incorporation or proper consideration of such relevant data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

Due to these methodological inadequacies, the conclusions regarding negligible or non-significant effects are grounded in assumptions rather than solid evidence. The deficiency of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, this engenders uncertainty concerning the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has failed to properly identify or assess the protected species involved. The resulting uncertainty precludes the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, the granting of consent cannot be lawfully justified.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These shortcomings inhibit a rigorous evaluation of the impacts on marine ecology and protected species, ultimately contributing to the overarching determination that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment fails to demonstrate that internationally important seabird populations will remain unaffected, specifically those associated with protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not adequately considered, and the reliance on modelling approaches introduces uncertainty. This is particularly critical for species that are already in severe decline, like Kittiwakes and Fulmars, as the methodologies used are likely to underestimate mortality rates. Furthermore, the siting of turbines within a recognised migratory corridor poses a serious risk, as it creates a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of potential sustained mortality within this corridor or the impact on species with relatively small global populations.

The ornithological assessment is flawed due to significant gaps in evidence and internal contradictions that undermine its conclusions. While the developer claims that there will be no significant adverse effects, they concurrently argue a case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This contradiction raises serious questions about the reliability of the assessment and

suggests that the conclusions drawn are not grounded in the underlying evidence.

Regulatory requirements are not met, as the application fails to achieve the evidential threshold necessary to ascertain no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, in addition to data gaps and limitations in the modelling processes, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, which complicates any lawful conclusion in support of consent.

Ultimately, the assessment is unreliable, marked by methodological weaknesses, internal inconsistencies, and insufficient evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination. Furthermore, it is in direct conflict with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets, as it fails to demonstrate that significant seabird populations will not be adversely affected.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment concerning cultural heritage and community identity is alarming, as it does not acknowledge the West Lewis coastline as a vibrant cultural landscape. This area, where environment, language, tradition, and community are deeply interconnected, is treated reductively in the application, which views heritage merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These active burial sites, integral to spiritual practices, have been mischaracterised as static features, disregarding their current use, significance, and the effects of development on their surroundings. This oversight leads to an incomplete assessment of cultural impacts and neglects their vital role in community life.

The failure to consider intangible cultural heritage is another major concern. Elements such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment are crucial to the area's identity, yet they are wholly omitted from the assessment. Without acknowledging these aspects, it is impossible to gain a true understanding of the cultural impact of the proposed development.

Moreover, there are pressing issues regarding community rights and engagement. The Gaelic-speaking population, which embodies the characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's credibility and disregards established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment represents a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018, and without it, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in stark opposition to National Planning Framework 4, especially regarding the protection of historic assets and places. Ignoring both tangible and intangible heritage, as well as failing to recognise living cultural practices, constitutes a clear violation of policy requirements.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and necessary statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately examined, and the application falls short in providing a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical concern that undermines the entire evaluation process for this application. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap hinders both public understanding and the competent authority's ability to gauge the full scope of social risks identified through the developer's own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The failure to release the complete assessment restricts proper scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process as well. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning are concerned. By failing to provide the complete dataset, the application lacks a thorough evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not satisfy the requirements outlined in National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the existing evidence suggests that adverse effects have not been fully disclosed. Without the full assessment, the application cannot demonstrate compliance with this policy.

The procedural ramifications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. 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 presented regarding seascape, landscape, and visual impacts falls significantly short of accurately capturing the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines positioned near the shoreline would establish an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently represent the extent of the visual transformation. Given their size and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots. This would detrimentally affect visual amenity and compromise the defining characteristics of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the most adverse scenarios, particularly concerning critical cultural heritage sites and valuable landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby undermining the assessment's reliability.

Additionally, there is a notable failure to evaluate the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones, alongside other Scheduled Monuments, form part of a broader landscape intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as independent entities without acknowledging their interdependence,

leading to an incomplete analysis of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the protection of natural environments and historic assets. The magnitude of change is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further weakens any assertion of policy compliance.

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

In summary, the assessment fails to accurately depict the impact's scale, the environment's sensitivity, and the interrelated nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is fundamentally inadequate, lacking the detailed analysis necessary to evaluate potential environmental effects. Substantial works on the seabed and installation activities will take place within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that are to be developed after consent is granted. This approach precludes any meaningful evaluation of the adequacy or effectiveness of such measures.

The reliance on unspecified future measures raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are susceptible to disturbances and contamination due to sediment. 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 the prevention, control, or monitoring of these risks.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Without rigorous modelling and clearly defined management strategies, it remains impossible to

ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The absence of well-defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the assessment of whether appropriate safeguards are established to address pollution incidents. This introduces a procedural risk and undermines the competent authority's ability to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and their mitigation must be evaluated before consent is granted, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the deficiencies surrounding the absence of clearly defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These failings obstruct 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 a vital fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate. It does not offer a strong evaluation of ecological or socio-economic impacts. The application fails to provide assurance that these essential uses and habitats will be preserved without significant disruption.

A key concern is the assumption that fishing activities can be moved without adverse effects. There is no evidence presented that alternative fishing grounds are accessible or can accommodate increased pressure. This lack of information is critical, as displacement could lead to overfishing in other areas and impact the local fishing fleet's economic wellbeing. Without a thorough, evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses serious risks to marine species, particularly due to underwater noise from construction activities. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life over large distances, notably affecting dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these impacts without adequate supporting data.

The application also exhibits a clear contradiction; it acknowledges the requirement for

licences to allow harm to European Protected Species while simultaneously claiming that impacts are negligible. This inconsistency diminishes the assessment's credibility and raises compliance issues with the Habitats Regulations, especially where anticipated harm necessitates legal permission.

Furthermore, the evaluation neglects to consider cumulative impacts stemming from multiple factors, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough appraisal of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works fails to provide a complete picture, as it treats these components separately despite their intrinsic connection. This fragmented approach obscures the full extent of environmental and socio-economic impacts of what is essentially a single integrated project. The onshore works entail cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities will take place in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The absence of a comprehensive assessment of these impacts prevents a thorough understanding of the overall environmental footprint of the project.

Moreover, the application's exclusion or deferral of onshore impacts hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities. Significant risks to sensitive habitats, such as machair systems and peatland environments, have not been adequately addressed, which raises concerns regarding biodiversity protection and compliance with policy requirements. The application does not provide evidence that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, thus presenting a clear evidential gap.

The proposal further generates concerns around carbon balance, as the disturbance of peatland could release stored carbon, creating a carbon debt that contradicts the goals of renewable energy development. The failure to adequately address this aspect or to demonstrate that the overall carbon balance remains beneficial is a critical oversight. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

From a policy standpoint, the disjointed assessment of the project as a whole undermines the protection of peatlands, habitats, and land use interests, conflicting with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated adds further weakness to the application. In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the region's identity and the potential growth of sectors such as astro-tourism. This gap in the overall landscape and environmental assessment is substantial.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to consider how aviation lighting may affect these species or contribute to mortality rates.

This oversight is further aggravated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the broader assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall landscape.

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 means that the application remains incomplete and cannot support 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 proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

There are significant gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, unspecified mitigation measures, and the lack of crucial impact assessments, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This inadequacy impedes a thorough understanding of the potential significant effects and residual impacts associated with the project.

Moreover, procedural shortcomings are evident, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory requirements under the Islands (Scotland) Act 2018. The non-disclosure of a complete Social Impact Assessment is another critical omission. These failures hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also misaligned with the National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, nor does it show that health and wellbeing impacts are manageable. Furthermore, the lack of tourism impact modelling means that a net economic benefit cannot be substantiated. The cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments

concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle. This failure prevents a lawful determination that impacts are acceptable.

The proposed development would also effect substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual connections, and adverse impacts on tourism are permanent consequences that cannot be mitigated effectively.

In conclusion, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with policy discrepancies and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority should therefore refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A4F78541

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies concerning planning, environmental factors, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region known for its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural identity. Concerns arise from the scale, proximity, and design of the project, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful decision. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent, while important elements of the proposal remain undefined. The flexible design framework used complicates a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed grasp of the environmental, cultural, or community impacts. Claims regarding negligible or non-significant effects lack robust evidence to support them.

There are notable and substantive policy conflicts present. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It fails to demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to determine the development's acceptability within policy parameters.

The unprecedented scale of the proposal raises significant concerns about its impact on the local landscape, with large turbines positioned alarmingly close to the shoreline, which threatens to dominate the visual environment and adversely affect the ecology. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle be applied.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a coherent and reasoned comparison of viable alternatives based on environmental effects, the application merely provides a narrative detailing the project's evolution. This methodology does not adequately illustrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging ones.

There is an absence of a transparent, evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application does not demonstrate that the developer has genuinely considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial importance of proximity to the shore in determining impact, the lack of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, with an over-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 infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission that reinforces the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the interconnectedness of landscape and cultural heritage is significantly lacking and does not sufficiently consider the sensitivity of the receiving environment. The proposed large-scale turbines near the West Lewis coastline would introduce a continuous industrial presence that would fundamentally alter the area's undeveloped character and open Atlantic horizon. This change would result in a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately represents the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and sense of remoteness that define this region. The assessment fails to convey the true significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the magnitude of visual impact, which undermines the assessment's reliability.

Additionally, there is a critical failure to evaluate the interconnected relationship among the landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are embedded in a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete understanding of the impacts on their cultural significance and setting.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This issue transcends visual impact, presenting a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which prioritises the protection of natural places and historic assets. The proposed scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further calls into question any assertions of policy compliance.

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

In summary, the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this valuable landscape.

TOURISM

The application acknowledges that a substantial 86% of visitors are attracted to the Isle of Lewis due to its stunning scenery, yet it lacks a detailed assessment of how large-scale offshore infrastructure could influence visitor numbers and overall economic contributions. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness, which all play a critical role in the visitor experience. The absence of a thorough analysis raises serious concerns about the potential economic and social repercussions for this vital sector.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the implications of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise an already thriving sector.

Moreover, the importance of environmental quality in sustaining tourism has been overlooked. The significance of unspoiled landscapes and dark skies cannot be underestimated, particularly regarding emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on this growing facet of the local economy.

Given the limited economic diversification of this island community, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as required under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development, particularly when measured against statutory duties, national policy, and evidential standards. It mirrors the issues identified in the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented

under a more rigorous policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical concern is the inadequacy of the evidential basis provided for evaluation. There are notable gaps in baseline data, and the continued use of an undefined design envelope is problematic. The application relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete and does not facilitate a full understanding of significant effects or residual impacts.

There are procedural shortcomings as well. The failure to include a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a significant shortcoming. These failures hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal contradicts the principles set out in National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural spaces, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means there is no substantiated claim of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed appropriately, leaving gaps in understanding the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potential significance surround the environmental risks associated with this proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to rule out adverse effects with reasonable scientific certainty has not been achieved, thus invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the combination of procedural and substantive deficiencies renders the application unfit for determination. The extensive information gaps, policy conflicts, and unresolved environmental risks preclude a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent for this application or exercises the relevant regulatory provisions to mandate the submission of the necessary information.

Consequently, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

The scale of this proposal is so damaging to the uniqueness of the island it will affect the tourist industry.

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: 1A68570B

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

Dear Sir/Madam

This document serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted pursuant to marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural dimensions. The proposed development, situated off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a largely untouched environment, and a rich cultural identity. Concerns arise from the scale, proximity, and design of the project, which may not align with statutory requirements, national policy, and sustainable development principles.

The application does not furnish a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders an evaluation of their efficacy impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident, as the proposal is seemingly at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to biodiversity, natural environments, cultural heritage, and public health and wellbeing. The application does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, featuring large turbines located close to the shoreline, raises significant issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy demonstrates that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are significant and cannot be overlooked. A major concern is the reliance on a flexible Project Design Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and undermines the assessment's integrity, leading to a situation where the presented impacts may not accurately represent the eventual development. As a result, the public and the competent authority are unable to grasp the true environmental effects of the proposal.

Furthermore, the application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be mitigated later is unacceptable and does not allow for a meaningful evaluation of effectiveness or an assessment of any residual impacts. This postponement of essential information until post-consent stages contradicts the very purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established before any determination is made.

Additionally, there are considerable evidential deficiencies present, including gaps in baseline data and limitations in the employed methodology, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, especially where conclusions indicating negligible or non-significant effects are drawn without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

The application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly in relation to 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 cannot substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data ultimately renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, putting the competent authority in a position where it cannot make a well-informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The proposed project exhibits significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements laid out by the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not adequately

demonstrate that less harmful options have been properly identified, evaluated, and selected over more damaging solutions.

There is a clear lack of transparency and evidence in the comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has given serious consideration to placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis prevents a conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis demonstrate that mitigation through design has not been employed, leading to a reliance on post-design measures to address impacts.

Consequently, the application does not prove that environmental harm has been adequately minimised through the choices made regarding site selection, layout, and infrastructure routing. This oversight constitutes a deviation from the established mitigation hierarchy and inhibits the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, these deficiencies call into question the application's alignment with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that underpins the overall conclusion that the application has not been sufficiently evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly inadequate, failing to provide a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet the methodologies used lack the ability to fully capture species presence, behaviours, and habitat usage, leading to an incomplete baseline data set. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider

their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the evaluation of basking sharks is problematic, as it relies heavily on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially in comparison to established land-based observations that indicate their frequent use of these waters. The failure to integrate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions reached.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risks to marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent cannot be justified under the law.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions collectively render the assessment unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The concerns surrounding the ornithological assessment are significant, revealing major flaws that challenge its conclusions. The development's location on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline, necessitates a higher evidential standard to ensure that these species will not face adverse effects. However, the application fails to adequately assess the implications of displacement, collision risk, or habitat loss, particularly within key foraging areas and migratory pathways.

A notable inconsistency arises in the application, where the developer asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This contradiction raises doubts about the assessment's credibility and indicates a lack of support for the conclusions drawn from the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to

protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The crucial feeding grounds are not thoroughly considered, and the reliance on modelling approaches adds uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies employed appear to underestimate mortality rates, compounded by incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents another serious risk, as it creates a barrier along a primary flight path that species use when travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately evaluated, nor are the potential effects on species with smaller global populations considered. From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain 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, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby undermining the validity of any conclusions drawn in favour of consent.

Additionally, the deficiencies noted reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues reveal an assessment that is unreliable, marred by internal inconsistencies, methodological shortcomings, and a lack of sufficient evidence. These inadequacies hinder a thorough evaluation of impacts and culminate in the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. Rather than recognising heritage as a living, dynamic element, the application simplifies it into isolated, static assets. This flawed perspective neglects the ongoing social, cultural, and spiritual significance of these elements within the community.

Particularly alarming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical markers; they are active locations for burial and spiritual practices. The assessment reduces them to static features, ignoring their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic

language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they are entirely absent from the evaluation, representing a significant gap. Without addressing these factors, the true cultural impact of the development remains obscured.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, with recognised characteristics of Indigenous Peoples, yet the application does not include a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contravenes established principles that call for participation in decisions affecting cultural and environmental matters.

A major procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone obstructs a lawful determination.

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

Taken as a whole, the failure to assess living heritage, intangible cultural value, community rights, and statutory duties creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not provide a sufficient foundation for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration has significant shortcomings regarding the assessment of social impacts, health, and wellbeing. 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. This lack of transparency creates a substantial evidential gap, obstructing both public understanding and the competent authority's ability to assess the full range of social risks identified in the developer's own research.

Residents have already reported measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These effects are based on direct engagement rather than speculation. Nevertheless, the absence of the full assessment limits the scrutiny of these findings and hampers the ability to evaluate their relevance in the decision-making process.

Additionally, there are indications that the proposal is viewed as a threat to community

identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these social impacts have not been adequately incorporated into the main application nor given the appropriate weight 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 transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning could be affected. The application’s failure to provide a complete dataset hampers the ability to weigh benefits against potential harm effectively.

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 available evidence reveals existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural implications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, which constitutes a material omission in the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological issues also arise from the selection and presentation of visual

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with this proposal is insufficient, lacking the necessary detail to evaluate the likely environmental effects. It entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be developed after consent is granted, which hinders any meaningful evaluation of their effectiveness or adequacy.

This reliance on unspecified future measures raises serious concerns, especially in

light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats, both of which are at risk from sediment disturbance and contamination. While the application does acknowledge potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient details on preventative, control, or monitoring measures.

Uncertainty also exists 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 effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application undermines the ability to evaluate whether suitable safeguards are in place to address pollution events, thus introducing procedural risks that impede the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements set forth in the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation measures must be evaluated prior to granting consent, and without this information, a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Collectively, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These deficiencies prevent a thorough evaluation of construction and pollution risks and reinforce the assertion 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 significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic consequences.

Onshore activities encompass the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically delicate environment. The absence of a thorough assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

The deferral of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates a holistic consideration of all project elements; however, the disconnection between offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats, including machair systems and peatland ecosystems, which are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been put in place, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns surrounding carbon balance also arise from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this issue or prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. There is a lack of evidence indicating that the requisite consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the project.

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

In summary, the fragmentation of project components, the incomplete assessment, and the lack of evidence concerning environmental and land use effects render this aspect of the application unreliable and incomplete, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the important aspects of dark skies and nocturnal wildlife, resulting in a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that could be seen from long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

The application lacks any evaluation of how this lighting would affect visual amenity, landscape character, or the experience of both residents and visitors. This is

particularly critical as dark skies are vital to the area's identity and are increasingly significant for tourism sectors like astro-tourism. The absence of this analysis creates a notable gap in the overall assessment of the landscape and environmental impact.

Furthermore, the application does not consider the potential effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. There is no lighting impact assessment or phototaxis study included, meaning the potential effects of aviation lighting on these species remain unexamined, which could lead to increased mortality rates.

This lack of evaluation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal behaviours and related risks. Species such as Kittiwakes, known to forage or migrate at night, are also at risk of disorientation from artificial light, yet this has not been adequately assessed. Without site-specific data collected during night-time, there is a significant gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain if protected species or designated sites would face adverse impacts. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and inhibits a lawful determination.

From a policy standpoint, the lack of assessment contradicts National Planning Framework 4, which focuses on the protection of natural places and maintaining environmental quality. It also affects the overall landscape and seascape evaluations, as the character of the night-time environment is a crucial element of the ecosystem.

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

TOURISM

The assessment regarding the impacts of tourism is severely lacking and does not adequately address the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is fundamentally reliant on these attributes. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the

industrialisation of the seascape and the decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this crucial analysis, it remains uncertain whether the proposed development would bring a net economic benefit or jeopardise an established and thriving sector.

Moreover, the evaluation neglects to acknowledge the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the failure to evaluate tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appropriately assessed as mandated by the Islands (Scotland) Act 2018.

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

Ultimately, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependence leads to a significant evidential gap. This inhibits a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application presents issues similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks the necessary evidential basis for determination.

Significant gaps in baseline data are present, and the application utilises an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment is also a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

Moreover, the proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been sufficiently assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the project are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking 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, and the disruption of cultural and visual relationships would result in permanent effects on tourism that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or require the submission of the outstanding information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E45C51AE

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and 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 proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically

active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability due to substantial internal inconsistencies and methodological weaknesses. It is crucial to highlight that the application fails to provide adequate evidence that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The site is situated within

key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

A fundamental contradiction exists within the application itself; while the developer asserts that there are no significant adverse effects, they simultaneously present a case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Furthermore, the methodologies used in the assessment are likely to underestimate mortality rates, especially for species like Kittiwakes and Fulmars, where baseline data is lacking and behavioural responses remain unclear.

The positioning of turbines within a recognised migratory corridor presents an additional risk, as it creates a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. There has been insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential repercussions on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these critical seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally flawed, characterised by internal inconsistencies, inadequate methodologies, and a lack of sufficient evidence. These issues collectively hinder a thorough evaluation of impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the development's impact on cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a living cultural landscape that interlinks environment, language, tradition, and community. By adopting a narrow perspective, the application treats heritage as a collection of isolated, static features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its inadequate treatment of culturally

significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are mischaracterised as static features. This neglect of their ongoing use and significance leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Additionally, the assessment fails to account for intangible cultural heritage, such as the Gaelic language and the traditions that have fostered a deep connection between the community and the coastal environment. These vital components are essential to the area's identity yet are conspicuously absent from the assessment, highlighting a considerable oversight. Without recognising these elements, it is impossible to fully comprehend the cultural impact of the proposed development.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the lack of Free, Prior and Informed Consent processes undermines the assessment's validity. This failure to engage meaningfully with the community compromises the integrity of the evaluation and neglects established participatory principles concerning cultural and environmental matters.

Moreover, the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018, represents a critical procedural failure. This assessment is essential for the competent authority to meet its legal obligation to assess social, cultural, and economic impacts on the island community. Its omission alone precludes a lawful determination.

From a policy standpoint, these shortcomings directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the failure to acknowledge living cultural practices constitute a significant deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and adherence to statutory obligations leads to a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for evaluating the genuine cultural costs associated with the proposal.

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application under review presents an inadequate assessment of fisheries and marine life. It does not deliver a robust evaluation of either ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequences. The application lacks evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle additional pressure. This oversight is critical as it poses risks of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal raises considerable risks for marine species due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across large distances, significantly affecting species such as dolphins. The application suggests a likely disturbance to a considerable portion of the local bottlenose dolphin population, yet this is downplayed without adequate supporting evidence, which raises serious concerns.

There exists a notable inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is recognised, while impacts are concurrently described as negligible. This contradiction undermines the credibility of the assessment and calls into question compliance with the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

Additionally, the assessment fails to account for cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding the onshore infrastructure is fundamentally inadequate and overlooks the full range of impacts associated with what constitutes a single integrated project. There exists an intrinsic link between the offshore turbines and the onshore works, yet these components are evaluated separately, leading to a fragmented

methodology that obscures the overall environmental and socio-economic ramifications.

The onshore works encompass cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These undertakings require excavation in areas of deep peat, particularly within Barvas Moor, which serves as a critical carbon store and ecologically sensitive habitat. The current application does not deliver a thorough assessment of these impacts, which inhibits a comprehensive understanding of the project's total environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore impacts hampers an adequate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project must be assessed collectively; however, the distinct treatment of offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Significant risks to sensitive habitats also arise, including machair systems and peatland environments that are under policy protection. The application fails to prove that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a substantial evidential gap concerning biodiversity protection.

In addition, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks evidence that essential consents or processes have been initiated, raising concerns about the feasibility and lawful execution of the project.

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

In conclusion, the disaggregation of project components, the absence of a thorough assessment, and the lack of demonstrable evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, visible over considerable distances, would create an ongoing and intrusive “wall of light” effect across the western horizon,

fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This failure is particularly important considering the significance of dark skies to the area's identity and the development of emerging tourism sectors, such as astro-tourism. This gap in assessing landscape and environmental impacts is concerning.

Equally alarming is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species including 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 a heightened risk of collision. The absence of a lighting impact assessment or a phototaxis study in the application means there is no evaluation of how the aviation lighting may impact these species or contribute to increased mortality.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and its associated risks. For example, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this potential risk remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4, particularly concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the overall assessment 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 assessment concerning dark skies and nocturnal wildlife constitutes a major evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The proposal fails to adequately assess the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism, which has seen a substantial increase from £65 million in 2017 to over £81.5 million, supports more than 1,000 jobs and constitutes up to 16% of the island's economy. The application acknowledges that 86% of visitors are attracted to the scenery yet does not provide a quantified evaluation of how large-scale

offshore infrastructure could influence visitor numbers, behaviour, or economic contributions.

Furthermore, there is a notable deficiency in understanding the significance of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies. These elements are crucial for enhancing visitor experiences and have relevance for emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment deepens this gap, leaving key impacts on a recognised and growing segment of the local economy unexamined.

The implications of failing to assess tourism impacts extend beyond the economic sphere, affecting employment opportunities, local businesses, and community sustainability in an island community with limited economic diversification. The lack of a compliant Island Communities Impact Assessment means that these vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impacts and the necessity to illustrate net benefit. Additionally, it contradicts strategic goals that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the combination of unquantified tourism impacts, inadequate assessment of environmental influences on visitor behaviour, and a disregard for the island's economic dependencies creates a significant evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the key issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the deficiencies in the current application remain significant.

A thorough review reveals a lack of a complete and reliable evidential basis for determination. There are notable deficiencies in baseline data, the application employs an undefined design envelope, and it relies on unspecified mitigation measures. Furthermore, there is an absence of critical impact pathways, particularly regarding nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full comprehension of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a material oversight. Such deficiencies hinder the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal is directly at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been adequately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are present, and inconsistencies exist within these evaluations. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which invokes the precautionary principle and precludes a lawful conclusion that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of the informational deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or exercise the relevant regulatory provisions to obtain the missing information.

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

Additional Comments

I cannot understand why choose one of the most beautiful and important areas of the British Isles to desecrate in this manner. There are many other suitable sites that will have similar results with far less impact on the environment.

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: A0EC1B6B

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 application is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and a strong cultural identity, as well as its near-pristine environment. A thorough review of the Environmental Impact Assessment Report and supporting documents reveals significant planning, environmental, cultural, and procedural deficiencies that cannot be overlooked.

The proposed development raises serious concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development. The application lacks an adequate evidential basis for lawful determination. Critical environmental data is absent, with baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, which obscures the potential significant effects of the development. The reliance on a flexible design framework, alongside mitigation measures that have yet to be specified, prevents an accurate assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, leaving unsupported claims regarding negligible or non-significant effects.

There are also clear and serious conflicts with established policy. 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 adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal presents major challenges, with large turbines situated close to the shoreline. This proximity raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and incapable of supporting a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency to accurately convey the potential environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This uncertainty undermines the integrity of the assessment, as the impacts outlined may not correspond to the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are currently undefined. Seeking consent based on the promise of addressing environmental harm at a later stage hampers the ability to assess the effectiveness of these measures or evaluate residual impacts. This deferral of crucial information to post-consent stages is not only procedurally unacceptable but also contradicts the fundamental objectives of the Environmental Impact Assessment process, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that suitable safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data fundamentally undermines the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region, known for its sensitivity and biological activity, is not well represented in the baseline data gathered. The methodologies

employed do not effectively capture the presence, behaviour, and habitat usage of key species, which compromises the validity of the impact evaluations.

One glaring oversight is the treatment of otters, a species protected under European law. The application neglects to properly identify and assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural habits means that the potential impacts of construction disturbance, noise, and increased activity remain inadequately evaluated. This omission significantly undermines claims regarding the absence of significant effects on otters.

Moreover, the assessment of basking sharks suffers from methodological flaws, particularly due to the reliance on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely results in an underrepresentation of their presence, in stark contrast to established land-based observations which indicate frequent usage of these waters. The disregard for or improper consideration of this crucial data further contributes to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, this introduces uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it fails to accurately identify or assess protected species. The degree of uncertainty that arises prevents the possibility of ruling out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to provide sufficient evidence that internationally important seabird populations, including those associated with protected sites like the Lewis Peatlands and St Kilda, will not be adversely affected. The west coast of the Isle of Lewis is home to many seabird species that are already in decline, yet the assessment does not robustly demonstrate, to the necessary evidential standard, that these species will be safeguarded. The reliance on modelling approaches, particularly for species in severe decline such as Kittiwakes and Fulmars, introduces uncertainty. The

methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and the behavioural responses of these birds are not fully understood.

Significantly, the siting of turbines within a recognised migratory corridor poses an additional risk by creating a barrier within a primary flight path utilised by species travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations. The shortcomings in the assessment raise serious concerns about the reliability of the conclusions drawn.

A fundamental contradiction within the application sees the developer asserting 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 undermines the validity of the assessment and indicates that the conclusions presented do not align with the evidence that supports them.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Taken as a whole, the assessment is unreliable, marred by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These flaws preclude a thorough evaluation of the impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application does not adequately illustrate the extent of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the qualities of naturalness and remoteness. The

assessment fails to effectively communicate the significance of these impacts within the context of such a sensitive landscape.

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

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

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

The identified impacts are inherently unmitigable. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change to the landscape is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in the assessment of construction and pollution risks, leading to an incomplete evaluation of potential environmental effects. It involves extensive seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application suggests relying on future mitigation and contingency measures, which will be established after consent is granted. This approach hinders any meaningful assessment of their

adequacy or effectiveness prior to approval.

The sensitivity of the receiving environment amplifies the issues associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies. Additionally, 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, the extent, duration, or ecological impacts of these plumes cannot be determined, raising further concerns for sensitive marine species and habitats identified in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs 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 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 necessary mitigation measures must be evaluated before consent, and the lack of this information means a lawful determination cannot be achieved.

Ultimately, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries presented in the application is inadequate, lacking a comprehensive analysis of both ecological and socio-economic effects. The waters adjacent to the West Lewis coast host a rich marine ecosystem and a thriving fishing industry. However, the application does not sufficiently demonstrate that these critical habitats and uses can be preserved without significant disruption.

One of the principal concerns is the presumption that fishing activities can be displaced without repercussions. The application fails to provide evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate the resultant pressure. This critical omission raises substantial concerns, as displacement could lead to overfishing in different areas, which may have broader economic implications for the local fishing fleet. Without a detailed and evidence-based evaluation, the potential consequences for fisheries and local livelihoods remain unclear.

Additionally, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. Notably, the projected disruption to a significant portion of the local bottlenose dolphin population warrants serious attention, yet the application downplays these impacts, lacking adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises significant compliance issues with the Habitats Regulations, particularly where expected harm requires legal authorisation.

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

From a policy standpoint, the application does not sufficiently demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can harmoniously coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Collectively, the absence of evidence related to fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application contribute to an incomplete and unreliable assessment. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

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: F028B57E

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

Dear Sir/Madam

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

One of the key issues is that the application does not present an adequate evidential basis necessary for a lawful determination. It is evident that critical environmental data is absent, and the baseline information provided is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined, which hinders the ability to assess potential impacts accurately. The reliance on a flexible design framework obscures an understanding of likely significant effects, while the unspecified mitigation measures leave their effectiveness uncertain. Consequently, the existing documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal conflicts with several policies, showcasing inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident with respect to biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application has not adequately demonstrated compliance with national obligations aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are central to the statutory tests required for consent and fundamentally undermine the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal introduces substantial concerns related to landscape capacity, visual dominance, and environmental impact, especially given the positioning of large turbines in close proximity to the shoreline. When considering the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hampers the assessment's integrity, making it difficult for both the public and competent authority to grasp the full extent of the environmental impacts.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that are not yet defined. Consent is requested on the premise that any environmental harm will be managed later, hindering a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and goes against the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly established prior to decision-making.

There are also significant gaps in baseline data, limitations in the methodology, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces a level of scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standard required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on environmental effects but instead offers a narrative account of project evolution. This method does not sufficiently demonstrate that less harmful options have been

properly identified, assessed, and selected in favour of more damaging solutions.

There is a 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 seriously considered positioning turbines further offshore, an approach that would likely lessen visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the significant impact of proximity to shore, the absence of such analysis prevents any conclusion that the proposed siting represents the least damaging option.

These inadequacies also extend to cable routing and landfall assessments, where there is insufficient evidence that alternative routes have been adequately explored 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 that mitigation by design has not been effectively employed, leading to a reliance on post-design mitigation measures instead.

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

From a policy perspective, this inadequacy 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 leads to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the development fails to convincingly demonstrate that these species will not be adversely affected, despite the crucial location within key foraging areas and migratory pathways. It does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss, resulting in significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions reached are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such

as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

The siting 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 long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with small global populations considered.

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in the modelling approach, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion in support of consent.

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

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a thorough evaluation of the 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 should be recognised as a living cultural landscape where environment, language, tradition, and community are interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated, static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. Nonetheless, these locations have been mischaracterised as static features, with the assessment failing to consider their continued use and the development's impact on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language and traditions, along with the long-standing relationship between the

community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the evaluation, representing a significant gap. Without incorporating these factors, the true cultural impact of the development cannot be adequately understood.

The absence of meaningful engagement with the Gaelic-speaking population, who possess a distinct cultural identity and characteristics of an Indigenous People, raises serious concerns about community rights. No process of Free, Prior and Informed Consent has been undertaken, undermining the legitimacy of the assessment and violating established principles of participation regarding decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination of the application.

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

Collectively, these failures to assess living heritage, intangible cultural value, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment currently 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 full report remains unpublished. This lack of access creates an important evidential gap, inhibiting both public understanding and the competent authority's ability to assess the identified social risks based on the developer's own research.

Local residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the omission of the full assessment hampers proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and

cohesion, with the concept of “cultural loss” highlighted in the developer's findings. Despite this acknowledgment, the impacts related to community cohesion have not been adequately incorporated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for developments to promote positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission constitutes a significant gap in the application and does not meet the evidential requirements established by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse impacts, results in an incomplete and unreliable assessment. This scenario impedes a lawful determination and highlights the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is seriously inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would establish a continuous and overpowering industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately represent the extent of visual alteration expected from the project. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the inherent qualities of naturalness and remoteness. Moreover, the assessment does not sufficiently convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints, as evidence indicates that these may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This may result in an understatement of the magnitude of visual impact, which compromises the overall reliability of the assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded in a broader landscape framework, visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these assets in isolation, failing to recognise their interdependence, which leads to a partial understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the safeguarding of natural areas and historic assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the change would be fundamental and permanent, not amenable to reduction to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected relationship between landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are vulnerable to disturbance and contamination. The proposal, which involves significant seabed preparation and installation activities in a high-energy Atlantic environment, lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted. This approach raises concerns, as it prevents a thorough assessment of these measures' adequacy and effectiveness.

The application acknowledges various risks, including sediment mobilisation and accidental chemical or oil spills, yet it does not offer sufficient detail on how these

issues will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts, which could affect sensitive marine species and habitats already identified in the broader assessment.

The omission of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards exist to address pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures prior to granting consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed, as it does not adequately assess the onshore infrastructure, leaving significant gaps in understanding its environmental and socio-economic impacts. The offshore turbines and onshore works are deeply interconnected, yet they are being evaluated independently. This disjointed approach obscures the full scale of the project's effects, resulting in an incomplete analysis that fails to capture the cumulative impact of these linked components.

Key onshore elements consist of cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access routes through sensitive landscapes. Notably, the construction involves excavating areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The current application lacks a thorough evaluation of these impacts, which is crucial for comprehensively understanding the project's overall environmental footprint.

By neglecting to assess onshore impacts or delaying this assessment, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment mandates that all aspects of a project must be assessed collectively. The current separation of offshore and onshore elements leads to an incomplete

understanding of how combined impacts affect peatlands, habitats, and local communities.

The proposal raises serious concerns regarding the integrity of sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The lack of evidence that these impacts have been fully assessed or that suitable avoidance measures have been applied signifies a notable evidential gap in the realm of biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to demonstrate that necessary consents or processes have been initiated, which brings into question the project's deliverability and lawful implementation.

From a policy standpoint, the disjointed assessment of the project components and the failure to ensure protection for peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated significantly undermines the legitimacy of the application.

Overall, the fragmented evaluation of the project components, the absence of a comprehensive assessment, and the lack of supporting evidence on environmental and land use impacts render this section of the application incomplete and untrustworthy, obstructing a lawful determination.

TOURISM

The application inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting

in a substantial gap in understanding the impacts on a recognised and burgeoning 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 for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It also runs counter to strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the deficiencies 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 shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined in statutory duties, national policy, and evidential standards. It revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data undermine the reliability of the application, which relies on an undefined design envelope and unspecified mitigation measures. Additionally, key impact pathways have been overlooked, including nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failures are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty under the Islands (Scotland) Act 2018. Furthermore, the incomplete disclosure of the Social Impact Assessment constitutes a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, lacking evidence of biodiversity protection, natural places, and cultural heritage preservation. It also does

not demonstrate that health and wellbeing impacts are acceptable or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Additional Comments

The sheer size of these proposed turbines so close to the shore is difficult to fathom. I had to search existing wind farms that I am familiar with to try and gauge their height. The north of Lewis is relatively flat so the visual impact alone would be substantial never mind the environmental impact. Whilst the turbine operators will no doubt be making substantial profits, I fail to see benefits for the islanders, quite the opposite in fact.

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: 461CA8FB

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and associated documentation reveals several material deficiencies concerning planning, environmental impacts, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns arise from the proposal's scale, proximity, and design, which fundamentally question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key elements of the proposal remain undefined. Furthermore, the flexible design framework employed hinders a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation fails to facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

Substantive policy conflicts are evident throughout the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal relies on an Environmental Impact Assessment Report that is materially deficient, failing to deliver a full, transparent, or reliable account of the likely environmental effects. A flexible Project Design Envelope has been employed, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and obstructs the consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Significantly, the application depends heavily on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consent is sought under the premise that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and fundamentally contradicts the purpose of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to determination.

The report is further compromised by considerable evidential deficiencies, such as gaps in baseline data and limitations in methodology, along with a reliance on assumptions rather than site-specific evidence. This leads 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 hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This raises concerns in relation to 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 unproven that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the dependence on an undefined design envelope, the absence of specified mitigation, and the existing gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and robust assessment of environmental effects and indicate that the competent authority lacks the necessary information to determine the application effectively.

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 lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their

active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a crucial migratory corridor on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that call its conclusions into question. The assessment fails to robustly evaluate critical aspects such as displacement, collision risk, and habitat loss, despite the fact that these seabird species are known to rely on key foraging areas and migratory pathways.

There exists a stark contradiction within the application itself. The developer asserts that there will be no significant adverse effects, yet simultaneously puts forth a

Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and raises serious doubts about the sufficiency of the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not fully recognised, and the methodologies used, which rely on modelling approaches, introduce uncertainty, particularly for species like Kittiwakes and Fulmars that are already experiencing severe population declines.

The implications of sustained mortality within this migratory corridor are not sufficiently addressed, nor are the potential consequences for species with relatively small global populations. From a regulatory standpoint, the application falls short of the evidential threshold needed to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and methodological limitations, means that the standard of beyond reasonable scientific doubt has not been met, thus engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely deficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic perspective, reducing heritage to a collection of isolated, unchanging features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in 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, yet the assessment inaccurately describes them as static entities, overlooking their ongoing significance, usage, and the development's effects on their surroundings. This misunderstanding results in an incomplete cultural evaluation and fails to account for their importance to community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and

the coastal environment. These critical aspects of identity are entirely omitted, representing a substantial gap in the evaluation. Without acknowledging these factors, the true cultural impact of the proposed development cannot be fully grasped.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking population embodies a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to adhere to established participatory principles in cultural and environmental decision-making.

Additionally, there is a notable procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority is unable to meet its legal obligation to assess the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly violates policy expectations.

In summary, the neglect to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory duties results in a substantial evidential void. The cultural ramifications of the development have not been properly examined, and the application fails to provide a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups involving local residents, yet the complete report has not been made available to the public. This omission creates a significant evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified through the developer's own investigations.

Residents have expressed measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposal, as evidenced by direct engagement rather than speculation. However, the failure to disclose the comprehensive assessment limits the opportunity for proper scrutiny of these findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor given the appropriate weight they warrant. The withholding

of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and function may be jeopardised. The absence of the full dataset results in an application that fails to present a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and avert harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it cannot be proven that the application complies with this policy.

The procedural implications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, combined with evidence of existing adverse impacts, renders the overall assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally lacking and does not truly capture the extent of the change or the sensitivity of the environment that will be affected. The character of the West Lewis coastline is defined by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. Should large-scale turbines be introduced near the shoreline, they would create a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to accurately depict the magnitude of this visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would significantly detract from visual amenity and undermine the intrinsic qualities of naturalness and remoteness. There is a concerning inadequacy in the assessment, which does not convey the true level of impact or its importance in a landscape of such sensitivity.

Moreover, there are methodological issues with how visual viewpoints have been

selected and presented. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which undermines the credibility of the assessment.

Another significant shortcoming is the neglect to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Iconic sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these sites as isolated features instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change represents not only a visual impact but also a more profound cultural and spatial harm that the application has not adequately considered.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for substantial seabed preparation and installation works within this high-energy Atlantic environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of sufficient assessment regarding fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not adequately show that these critical uses and habitats can be safeguarded or sustained without significant disruption.

A major flaw lies in the assumption that fishing activity can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or able to support the additional pressure that displacement would create. This is a crucial oversight, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the effects on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries substantial risks to marine species, particularly due

to the underwater noise produced during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life across large areas, significantly impacting species like dolphins. The application's predictions regarding disturbance to a considerable proportion of the local bottlenose dolphin population are alarming; yet, the significance of these impacts is downplayed without adequate supporting evidence.

There exists a clear inconsistency in the application, acknowledging the necessity 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 about compliance with the Habitats Regulations, especially where harm is expected to such a degree that legal authorisation is needed.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these cumulative effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

In summary, the significant 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 robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is incomplete, failing to take into account the extensive impacts of what is fundamentally a single integrated development. The offshore turbines and the onshore works are interconnected yet are evaluated separately, leading to a disjointed analysis that obscures the true environmental and socio-economic consequences.

Central to the onshore works are the plans for cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through sensitive landscapes. These activities involve the excavation of deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not provide a thorough examination of these impacts, hindering an accurate understanding of the project's overall environmental footprint.

By neglecting to assess the impacts of onshore works, the application restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be assessed collectively; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy initiatives. The application does not sufficiently address this issue or provide evidence that the overall carbon balance remains positive.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, leading to doubts about deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly important given the relevance of dark skies to the area's identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a major deficiency

in the overall landscape and environmental assessment.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, leaving a crucial gap in understanding how aviation lighting might impact these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates the issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of specific night-time data is a critical oversight in understanding ecological impacts.

Without assessing nocturnal impacts, it cannot be determined 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 decision.

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

In summary, the lack of an assessment of dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences 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. It is acknowledged that 86% of visitors are attracted by the scenery; however, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this 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 fails to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a considerable gap in understanding the implications for a recognised and growing aspect of the local economy.

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

From a policy perspective, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not provide adequate evidence to enable the competent authority to assess the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and considering the island's economic dependency result in a substantial evidential gap. This deficiency 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 fails to meet the requirements of sustainable development according to statutory duties and national policy. The core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, primarily concerning unacceptable industrialisation, have not been adequately addressed, despite the application being presented under a framework that places increased importance on biodiversity, peatland protection, and community wellbeing.

The evidential basis for determining this application is neither complete nor reliable. There are significant gaps in baseline data and a reliance on a design envelope that remains undefined. Mitigation measures are not specified, and critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment is a notable omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the

application unsuitable for determination.

Furthermore, the proposal contradicts the National Planning Framework 4, failing to demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been adequately conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been met, which necessitates the application of the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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

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

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

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: 1481C872

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 proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural identity. The scale and proximity of the project, along with its design, raise immediate and significant concerns about its compliance with statutory requirements, national policy, and sustainable development principles.

Critical deficiencies in the documentation undermine the possibility of a lawful determination. The application lacks an adequate evidential basis, with critical environmental data missing and baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by robust evidence.

There are clear policy conflicts that further challenge the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, cultural heritage, and health and wellbeing. The proposal does not demonstrate that national requirements for protecting biodiversity and environmental integrity can be satisfied. These conflicts directly affect the statutory tests needed for consent and compromise the authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal raises serious issues concerning landscape capacity, visual dominance, and environmental impact, especially with large turbines positioned closely to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental effects linked to the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to definitive turbine sizes, layouts, or configurations, creates

considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to grasp the true magnitude of the environmental effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to deliver a comprehensive and trustworthy understanding of ecological receptors within the West Lewis coastal environment. This marine system is particularly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not sufficiently capture essential aspects such as species presence, behaviour, and habitat use. Consequently, the assessment does not establish a solid evidential foundation for evaluating potential impacts.

One critical gap is the assessment related to otters, which are classified as a European

Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal areas for foraging and movement. The oversight concerning their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Additional shortcomings are evident in the evaluation of basking sharks. The dependence on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider relevant data results in an incomplete baseline, further compromising the reliability of the conclusions presented.

These methodological weaknesses culminate in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

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 to the public. This lack of transparency creates a significant evidential gap, making it impossible for both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research. The summaries that are accessible suggest that local residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, arising from direct engagement, are not speculative. However, without the full assessment being disclosed, there is no opportunity for proper scrutiny, which in turn limits the capacity to assess the significance of these findings within the decision-making framework.

Moreover, there is a clear perception that the proposal threatens community identity and cohesion, with indications of “cultural loss” appearing in the developer’s own findings. Nonetheless, these vital impacts have not been adequately incorporated into the main application nor given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, undermining the overall Environmental Impact Assessment process.

A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functionality. The failure to provide the complete dataset means that the application does not furnish a comprehensive evidential basis to weigh the benefits against potential harms.

From a policy standpoint, this application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and avoid detrimental effects; however, the available evidence suggests existing adverse impacts that remain undisclosed. Without the full assessment, there is no way to confirm compliance with this policy.

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

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This not only impedes a lawful determination but also reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

There are also concerns about how visual viewpoints were chosen and presented. Some viewpoints may not accurately reflect the most sensitive areas or worst-case

scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which compromises the assessment's reliability.

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

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

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

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

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

FISHERIES AND MARINE LIFE

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

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

on fisheries and the livelihoods dependent on them remain obscured.

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

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

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or avoid adverse effects on marine biodiversity. This lack of clarity prevents the determination of whether the proposal represents sustainable development.

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

TOURISM

The significant growth of tourism on the Isle of Lewis, which surged from £65 million in 2017 to over £81.5 million, is critical for local employment and the economy. This sector supports more than 1,000 jobs and accounts for up to 16% of the island's economic landscape. However, the application fails to adequately assess the economic and social consequences that large-scale offshore infrastructure would have on this essential aspect of the community.

Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, there is no quantified assessment of how such infrastructure might influence visitor numbers, behaviour, or the overall economic contributions of tourism. The potential industrialisation of the seascape and the resulting degradation of

environmental quality pose a serious risk to the sector's viability. The omission of a thorough evaluation of Tourism Gross Value Added and the broader economic resilience raises significant concerns about whether the proposed development would provide a net benefit or inadvertently harm a vital and thriving sector.

Moreover, the assessment does not address the crucial role that environmental quality plays in attracting tourists, particularly the appeal of unspoiled landscapes and dark skies. This oversight not only neglects the visitor experience but also overlooks burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment leaves a critical void in understanding the potential impacts on these growing elements of the local economy.

In an island community with limited economic diversification, the lack of a thorough assessment of tourism impacts has far-reaching implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependence creates a significant evidential gap. This gap hinders a robust evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory obligations, national policies, and evidential standards. It echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. This current application is presented under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of local communities.

There are substantial deficiencies in the evidential basis for the proposal, including critical gaps in baseline data and the utilisation of an undefined design envelope. The application relies on unspecified mitigation measures and fails to consider essential impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering the ability to fully comprehend likely significant effects or residual impacts.

Furthermore, the application contains notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contravenes the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Additionally, there is a failure to establish a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making a lawful conclusion regarding acceptable impacts unattainable.

This proposal would result in 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 negative impacts on tourism would create permanent effects that cannot be adequately mitigated.

In conclusion, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs the possibility of a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or exercise the relevant regulatory powers to demand the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: EE3C6B11

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to meet the requirements set out by the Environmental Impact Assessment regime. It does not offer a structured and reasoned comparison of realistic alternatives

based on their environmental effects; instead, it provides a narrative account of how the project has evolved. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

A lack of transparent, evidence-based comparisons is evident regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not illustrate that the developer has sufficiently considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be significantly lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in impact determination, the omission of such analysis undermines any argument that the proposed siting is the least damaging available option.

The inadequacies extend to the evaluation of cable routing and landfall assessment, with insufficient evidence showing that alternative routes have been rigorously explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to provide a clear avoidance strategy or comparative analysis suggests that the application has not adequately employed mitigation by design, instead relying on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This lack of adherence to the established mitigation hierarchy impedes the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a comprehensive assessment of alternatives raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies jeopardise adherence to National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment represents a material omission that ultimately leads to the conclusion that the application has not been sufficiently assessed and, as such, cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is fundamentally flawed, leading to an inadequate understanding of the ecological receptors within the West Lewis coastal environment. This region is a sensitive and biologically vibrant marine system, yet the baseline data provided is incomplete. The methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for assessing potential impacts.

One significant oversight in this evaluation is the failure to properly acknowledge otters, a European Protected Species, and their active utilisation of coastal areas for foraging

and movement. The omission of their core foraging range and behavioural patterns results in a lack of adequate assessment regarding the effects of construction disturbance, noise, and increased activity. This deficiency undermines any conclusions regarding the lack of significant effects on this species.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys that create a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to land-based observations that indicate frequent use of these waters. The failure to integrate or properly consider such crucial data results in a flawed baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any assertions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data further inhibits a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual level of risk to marine species and habitats.

Regulatory requirements are not met, as the application fails to accurately identify or assess protected species, contravening the principles of the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these circumstances, consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

The assessment lacks sufficient evidence regarding the potential impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical nature

of these feeding areas is underappreciated, and the dependence on modelling techniques introduces considerable uncertainty, particularly for species like Kittiwakes and Fulmars that are already in sharp decline. Furthermore, the methodologies utilised are likely to underestimate mortality rates due to incomplete baseline data and an inadequate understanding of behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is markedly deficient, as it overlooks the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interwoven. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the handling of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices; however, the assessment treats them merely as static features, failing to account for their continued usage and the implications of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects, disregarding their importance to community life.

Moreover, the application neglects to examine intangible cultural heritage, which includes the Gaelic language, local traditions, and the historical bond between the

community and the coastal landscape. These aspects are crucial to the area's identity but are entirely omitted from the assessment, constituting a significant oversight. Without addressing these elements, the cultural ramifications of the development remain inadequately understood.

Concerns extend to community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity, recognised as having characteristics of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been initiated. The lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters concerning cultural and environmental interests.

Another critical procedural lapse is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone precludes a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the preservation of historic assets and locations. The failure to recognise both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear deviation from policy requirements.

In sum, the neglect to evaluate living heritage, intangible cultural significance, community rights, and statutory duties creates a substantial evidential gap. The cultural impacts of the development have not been adequately considered, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report remains unpublished. This creates a notable evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks highlighted by the developer's own investigations.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement, thus are not speculative in nature. Nevertheless, the lack of access to the full assessment curtails proper scrutiny of its findings and restricts the evaluation of their significance during the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat

to community identity and cohesion, with findings from the developer indicating concerns over “cultural loss.” Despite these impacts being identified, they have not been thoroughly incorporated into the main application or given due consideration. The failure to disclose the complete 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. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functioning. The absence of the complete dataset means the application does not provide an adequate evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 with respect to health and wellbeing. Development proposals must foster positive health outcomes and avoid causing harm, yet the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural implications of these omissions 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 represents a material deficiency within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create an overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

Moreover, the application does not sufficiently address the extent of the visual change. The size and closeness of the turbines would dominate views from nearby residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The scale of transformation is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

In summary, the assessment fails to accurately depict the extent of the impacts, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the necessary detail to assess the potential environmental impacts. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, which results in a reliance on mitigation and contingency measures that are to be formulated post-consent. This approach hinders any meaningful evaluation of their potential effectiveness or

adequacy.

Given the sensitivity of the receiving environment, this reliance on unspecified future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and significant habitats that are particularly susceptible to sediment disturbance and contamination. The application identifies risks, including sediment mobilisation and possible chemical or oil spills, yet fails to provide comprehensive details on preventative, control, or monitoring strategies for these risks.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential repercussions for marine species and habitats that have already been recognised as vulnerable within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the assessment of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and weakens the competent authority's capacity to evaluate environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment framework. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent. The absence of this information renders a lawful determination impossible. Furthermore, the application does not adequately demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially incomplete. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is not sufficiently robust.

FISHERIES AND MARINE LIFE

The application does not provide a robust evaluation of ecological or socio-economic impacts regarding fisheries and marine life. It is critical to note that the waters off the West Lewis coast support a vibrant marine ecosystem alongside an active fishing industry. However, the application fails to adequately demonstrate that these vital uses and habitats can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activity can simply be

displaced without repercussions. The application offers no evidence to suggest that alternative fishing grounds are available, accessible, or capable of bearing additional pressure. This oversight is crucial because the risk of overfishing in other areas looms large, along with potential wider economic impacts on the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and livelihoods cannot be properly understood.

Moreover, the proposal brings substantial risks to marine species, particularly due to the underwater noise that will be generated during construction. High-energy hammer piling for prolonged periods is expected to cause disturbances over extensive areas, negatively impacting species such as dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns, yet the application seems to trivialise these effects without adequate supporting evidence.

There exists a troubling inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged, even as impacts are simultaneously characterised as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where anticipated harm may require legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal aligns with the principles of sustainable development.

In summary, the deficiencies evident in the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings prevent a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents an incomplete assessment of the onshore infrastructure, overlooking the comprehensive impacts that arise from this interconnected project. The offshore turbines and onshore works are inherently related, yet they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic implications.

Significantly, the onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, recognised as a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough evaluation of these impacts, which hampers a full understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application inhibits a proper appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be reviewed collectively; however, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal also raises critical concerns regarding carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this matter or shows that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land may lead to conflicts with current land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

From a policy standpoint, the failure to consider the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests runs counter to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further detracts from the application's validity.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent

red aviation lighting that would be visible from long distances, creating a persistent and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application fails to consider the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of dark skies for the area's identity and for growing tourism sectors like astro-tourism cannot be overstated. The lack of assessment creates a gap in the overall landscape and environmental evaluation.

There is also no assessment of how nocturnal wildlife may be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not contain any lighting impact assessment or phototaxis study, failing to address how the aviation lighting may affect these species or contribute to increased mortality.

This issue is aggravated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data leads to a critical gap in understanding ecological effects.

Without an assessment of the impacts on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the overall assessment of landscape and seascape impacts, as the character of night-time environments is essential to the broader context.

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

TOURISM

The analysis of tourism impacts within the application is fundamentally inadequate, failing to properly assess the economic and social ramifications for a crucial sector of the Isle of Lewis's economy. With tourism significantly relying on the area's wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness, it is notable that 86% of visitors are attracted primarily by scenery. Nevertheless, the application lacks a quantified assessment regarding how large-scale offshore

infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and comprising up to 16% of the island's economy. However, the application neglects to model the potential impacts of the seascape's industrialisation and the consequent loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the region. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise an established and thriving sector.

Furthermore, the assessment does not take into account the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community exhibits limited economic diversification, the lack of evaluation regarding tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined, as mandated by the Islands (Scotland) Act 2018.

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

In summary, the overall inadequacy in quantifying tourism impacts, failing to assess the environmental factors influencing visitor behaviour, and disregarding the economic dependency of the island results in a significant evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the essential requirements for sustainable development when evaluated against statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, relies on an ambiguous design envelope, and depends on unspecified mitigation measures. Furthermore, it omits critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It does not illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing a lawful assertion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The volume of informational deficiencies, combined with policy contradictions and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the applicable 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.

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: 74A08CC5

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 frameworks. A comprehensive review of the Environmental Impact Assessment Report and accompanying documents highlights numerous material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west side of the Isle of Lewis, this development threatens an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The nature, size, and design of the proposal raise serious questions about its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a solid evidential foundation necessary for lawful determination. It reveals significant gaps in critical environmental data, presents limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of the likely significant effects. Furthermore, the proposed mitigation measures, which have yet to be clearly articulated, hinder any assessment of their potential effectiveness. Consequently, the documentation fails to provide a thorough or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Substantial conflicts with established policy are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national mandates for protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies challenge the statutory tests necessary for consent and undermine the competent authority's ability to determine the proposal's acceptability in policy terms.

The scale of the proposed development is unprecedented for this locale, with large turbines located disturbingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, the reliance on unspecified mitigation strategies, evidential shortcomings, and evident policy violations illustrate that the application is fundamentally incomplete and incapable of facilitating a lawful decision. Under these circumstances, it is imperative that the precautionary principle be invoked.

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 assessment of alternatives presented in this application is fundamentally flawed and fails to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned evaluation of realistic alternatives with regard to environmental impacts, the application merely

recounts the project's development history. This lack of structured analysis does not illustrate that less harmful alternatives have been adequately identified, assessed, and chosen over more damaging options.

Moreover, there is a distinct absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered positioning the turbines further offshore, a move that could potentially mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline, where proximity to shore is crucial in assessing impact, the lack of such an analysis undermines any assertion that the proposed siting is the least damaging option.

These shortcomings are evident in the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to minimise impacts on sensitive areas. This includes vital sites of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, alongside the lack of comparative analysis, reveals that the principle of mitigation by design has not been properly implemented, leading to an over-reliance on remedial measures after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. A robust assessment of alternatives is essential; without it, it cannot be determined that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw, which further contributes to the conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight involves the otters, classified as a European Protected Species,

where the application neglects to appropriately acknowledge and assess their usage of coastal regions for foraging and movement. Without considering their core foraging range and behavioural tendencies, the assessment does not adequately address the possible impacts of construction-related disturbances, noise, and increased human activity. This shortcoming undermines any conclusions drawn about the lack of significant effects on this particular species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application concerning the potential impacts on ornithological interests 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 the internationally important seabird populations located on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. The placement of turbines within key foraging areas and migratory pathways has not been adequately evaluated, particularly regarding the risks of displacement, collision, and habitat loss.

A critical inconsistency arises within the application where the developer asserts that no significant adverse effects will occur while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not supported by the underlying evidence.

The evidence provided does not sufficiently assure that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, especially for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given incomplete baseline data and an inadequate understanding of behavioural responses.

Furthermore, situating turbines within a recognised migratory corridor presents an additional substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term consequences of sustained mortality in this corridor or the potential impacts on species that possess relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, compounded by data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

These deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted places the proposal directly at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity presents significant inadequacies, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a reductive framework that treats heritage as a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual functions within the community.

A notable shortcoming pertains to culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial grounds and places of spiritual significance. However, the assessment inaccurately categorises these sites as static features, overlooking their continued use and meaning, as well as the potential impact of development on their surroundings. This misrepresentation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The evaluation fails to encompass intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but are wholly omitted from the assessment, representing a critical gap. The absence of these considerations prevents an accurate understanding of the development's cultural impact.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People. The lack of a process for Free, Prior and Informed Consent severely undermines the legitimacy of the assessment, neglecting established principles of participation in matters affecting cultural and environmental interests.

Furthermore, a significant procedural failure is the omission of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to fulfil its statutory obligations to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone precludes a lawful determination.

From a policy standpoint, the outlined deficiencies position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a sound basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that includes focus groups with local residents; however, the full report has not been published. This lack of transparency creates a significant evidential gap and prevents both the public and the competent authority from fully understanding the social risks highlighted in the developer's own research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and

proximity. These impacts are based on direct engagement and not on speculation. Nevertheless, the failure to disclose the complete assessment limits the ability to scrutinise the findings and hinders the determination of their significance in the decision-making process.

There is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured. This lack of transparency also undermines the Environmental Impact Assessment process. For developments of this scale, a comprehensive understanding of social, economic, and health impacts is crucial, especially when community character and functioning may be affected. The application fails to provide a complete evidential basis for assessing the balance between benefits and harm due to the absence of the full dataset.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Developments should support positive health outcomes and avoid harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be shown. The procedural implications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application, failing 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, makes the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application does not possess sufficient information to move forward.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a permanent and irreversible alteration of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to adequately represent the extent of this visual change.

The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. However, the application does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

Moreover, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Rather than recognising their interdependence, the assessment treats these as isolated assets, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The anticipated scale of change contradicts the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further calls into question any assertion of compliance with policy requirements.

Additionally, 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 dominant and unavoidable, leading to changes that are fundamental and permanent, rather than capable 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 interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks lacks the necessary detail to adequately evaluate the likely environmental effects of the proposal. The project involves extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient detail on the prevention, control, or monitoring of these risks.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, determining the extent, duration, or ecological effects of these impacts is impossible. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment materially deficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the proposal is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats can be preserved or maintained without significant disruption.

One critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of managing the additional pressure. This lack of information is crucial, as such displacement poses risks of overfishing in other areas, potentially leading to broader economic implications for the local fishing fleet. Without

a clear and substantiated assessment, the ramifications for fisheries and local livelihoods remain poorly understood.

Moreover, the proposal raises significant risks for marine species, primarily due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb marine life across considerable distances, impacting species including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects without adequate supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, particularly when harm is expected to occur to a degree that necessitates legal authorisation.

The assessment also neglects to address cumulative impacts resulting from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Absent a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents significant shortcomings in its assessment of onshore infrastructure, which is incomplete and does not encompass the full range of impacts stemming from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through sensitive landscapes, are intrinsically linked to the offshore turbines. However, these components are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The absence of a thorough assessment of the impacts associated with the onshore elements particularly fails to address the implications of excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically

sensitive habitat. This gap in the assessment prevents a comprehensive understanding of the overall environmental footprint of the project.

Furthermore, the application's exclusion or deferral of the evaluation of onshore impacts hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be examined collectively; however, the disjointed evaluation of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also serious concerns regarding potential risks to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that these impacts have been fully assessed or that appropriate measures to avoid them have been established, revealing a substantial evidential gap in relation to biodiversity protection.

The proposal raises additional issues related to carbon balance, as the disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance remains favourable.

Moreover, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. There is a lack of evidence confirming that the necessary consents or processes have been initiated, which raises concerns about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests is 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.

Collectively, the fragmentation of project components, the lack of comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, which in turn obstructs 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 the area's cultural identity, environmental quality, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating an intrusive and continuous "wall of light" effect across the western horizon. This alteration would significantly disrupt the night-time environment, yet the application fails to assess the implications of such lighting on visual amenity, landscape character, or the experiences of local residents and visitors.

The absence of an evaluation of impacts on nocturnal wildlife is particularly concerning. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include a lighting impact assessment or a study on phototaxis, neglecting to consider how the introduction of aviation lighting may affect these vulnerable species or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activities and associated risks faced by species such as Kittiwakes, known to forage or migrate at night. This lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of the nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and thereby precluding a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, they undermine a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the overall ecology.

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

TOURISM

The proposed development has not adequately assessed the impacts on tourism, which is crucial to the economy of the Isle of Lewis. With tourism revenue having risen from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy, the failure to evaluate how large-scale offshore infrastructure might influence visitor numbers and behaviour is a significant oversight. The application acknowledges that 86% of visitors are attracted by the scenery but lacks a quantitative analysis of how this industrialisation might affect the overall economic contribution of tourism.

Furthermore, the assessment neglects the vital role of environmental quality in sustaining tourism. Key factors such as unspoiled landscapes and dark skies significantly enhance visitor experiences, particularly in emerging sectors like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment highlights a serious gap in understanding how the proposed development could adversely impact these crucial aspects of the local tourism economy.

In an island community with limited economic diversification, the lack of an impact assessment on tourism carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities of the island have not been adequately addressed, as required under the Islands (Scotland) Act 2018.

Policy-wise, the application falls short of demonstrating compliance with National Planning Framework 4, especially regarding economic impact and the need to show a net benefit. It fails to align with strategic objectives that identify tourism as a priority growth sector and does not 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 influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This gap hinders a thorough evaluation of the economic effects, reinforcing the notion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Notably, this new application is presented within a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

A thorough evidential basis for the determination of the application is lacking, with significant gaps in baseline data. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways—such as those affecting nocturnal wildlife, onshore infrastructure, and tourism—further contribute to an incomplete Environmental Impact Assessment. Consequently, this incompleteness hinders a full understanding of likely significant effects and residual impacts.

Moreover, procedural failures are apparent in this application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4 as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable, and it cannot

provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent within themselves. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

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

In light of these points, 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: AFF23D18

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential 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. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant 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 environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and does not offer a comprehensive, transparent, or reliable overview of the potential environmental effects associated with the proposal. Significant uncertainty arises from the adoption of a flexible Project Design Envelope that does not commit to specific dimensions, layouts, or configurations for the turbines. This uncertainty compromises the integrity of the assessment, leading to a situation where the impacts described may not align with the eventual development, thereby hindering both public understanding and the competent authority's grasp of the actual environmental consequences.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that any environmental harm will be mitigated at a later date obstructs a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of critical information to the post-consent phase is procedurally inappropriate and contravenes the aims of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly outlined before any determination can be made.

There are notable evidential gaps, including deficiencies in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. Such shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case scenarios, introducing scientific uncertainties that cannot comply with statutory obligations.

Consequently, the application does not fulfil the evidential standards mandated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate alignment with National Planning Framework 4, which includes stipulations regarding the protection of biodiversity and environmental integrity, since it is not evident that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of viable alternatives based on their environmental effects, it presents a narrative account of how the project evolved. This

approach does not adequately show that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a significant absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the proposal does not indicate that the developer has genuinely considered positioning the turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to the shore in assessing impact, the failure to include this analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings are also evident in the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy, along with insufficient comparative analysis, suggests that mitigation through design has not been effectively applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a material omission that significantly contributes to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to provide a complete and reliable understanding of the ecological receptors in this sensitive and biologically active area. Inadequate baseline data and poor methodologies result in an inability to accurately capture species presence, behaviour, and habitat use, leading to a lack of evidential support for evaluating potential impacts.

Among the critical shortcomings is the omission of otters, which are a European Protected Species. The application neglects to properly identify and assess their active use of coastal zones for foraging and movement. This oversight means that the assessment does not consider their core foraging range and behavioural patterns,

resulting in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity on this species. Consequently, the conclusions drawn regarding the absence of significant effects are undermined.

Moreover, the assessment of basking sharks suffers from serious deficiencies as it relies on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent use of the waters. The failure to consider such data adequately leads to an incomplete baseline and further weakens the reliability of the presented conclusions.

These methodological shortcomings result in assertions of negligible or non-significant effects being based on unsubstantiated assumptions rather than solid evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions, creating uncertainty about the actual risks 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 the 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, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally significant seabird populations that are already in decline. However, the ornithological assessment accompanying the application is fundamentally flawed. It contains significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The assessment fails to sufficiently demonstrate that these vulnerable species will not be adversely affected, particularly in light of the potential for displacement, collision risk, and habitat loss.

Compounding these issues is a fundamental contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions are not adequately supported by the available evidence.

Moreover, the assessment does not provide enough evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling techniques introduces further uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in modelling, indicates that the required standard of proof beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. It adopts a reductive approach, treating heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to static features, neglecting their continued use, meaning, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural

effects and overlooks their importance in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These elements are vital to the identity of the area but are glaringly absent from the assessment, representing a significant omission. Without the inclusion of these factors, the cultural impact of the development cannot be fully comprehended.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018, constitutes a critical procedural failure. The absence of this assessment hinders the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

From a policy standpoint, these deficiencies conflict directly with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, clearly deviates from policy requirements.

In summary, the neglect to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations results in a significant evidential gap. Consequently, the cultural impacts of the development have not been sufficiently evaluated, and the application does not provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment raises significant concerns about the lawful evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the full report of this assessment remains unpublished, creating a substantial evidential gap. This absence impedes both public understanding and the competent authority's ability to grasp the full scope of social risks revealed by the developer's own research.

Summaries suggest that local residents are experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement with the community, are factual rather than

speculative. However, the non-disclosure of the complete assessment restricts proper examination of the findings and hampers the determination of their relevance within the decision-making process.

Moreover, there is recognition that the proposal poses a perceived threat to community identity and cohesion, with findings indicating potential "cultural loss." Despite this identification, such impacts have not been fully incorporated into the main application nor given the appropriate consideration they warrant. The failure to provide the entire Social Impact Assessment effectively obscures the genuine human and social costs associated with the development.

This deficiency in transparency significantly undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be adversely influenced. The lack of a complete dataset in the application fails to provide a comprehensive evidential basis for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development projects are required to foster positive health outcomes while mitigating adverse effects; however, the existing evidence suggests negative impacts that remain inadequately disclosed. Without access to the full assessment, compliance with these policy requirements cannot be substantiated.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material shortfall within the application and reflects a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In summary, the withholding of the full Social Impact Assessment, in conjunction with the documented evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and supports the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal poses significant concerns regarding the interconnected relationship between landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and failing to evaluate the impacts on their setting and cultural significance adequately. The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their relationship with the natural horizon. This signifies a broader cultural and spatial harm that has not been sufficiently

addressed in the application.

The visual impacts identified are particularly concerning. The application does not accurately represent the magnitude of visual change resulting from the introduction of large-scale turbines. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct loss of visual amenity. The assessment inadequately conveys the significance of this impact within such a sensitive landscape, undermining the appreciation of naturalness and remoteness which defines the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not comprehensively reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings introduce a risk that the visual impact has been understated, casting doubt on the reliability of the assessment's findings.

From a policy standpoint, the proposal is incompatible with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of proposed changes conflicts with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a robust worst-case assessment further weakens any assertions of compliance with relevant policies.

The overall assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is not aligned with the protection of this landscape. It is evident that the impacts identified cannot be effectively mitigated; the scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable, leading to a permanent transformation rather than one that could be reduced to an acceptable level through mitigation efforts.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be prepared after consent is granted. This approach makes it impossible to evaluate their adequacy or effectiveness.

This reliance on undefined future measures is alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that can be affected by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and

accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

There is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clear management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have been identified as sensitive in the wider assessment.

The lack of detailed emergency response procedures worsens these issues. By pushing contingency planning to a post-consent stage, the application fails to allow evaluation of whether adequate safeguards are in place to handle pollution events. This introduces procedural risk and undermines the authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted. The absence of this information means that a lawful determination cannot be made. Moreover, 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 regarding potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

Moreover, the proposal carries significant risks for marine species, especially due to the underwater noise produced during construction. The anticipated extended hammer piling is expected to cause disturbances over large areas, impacting species such as

dolphins. The projected disturbance of a large segment of the local bottlenose dolphin population is alarming; however, the application minimizes these effects without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be reviewed

collectively; however, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that would create a persistent and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant change is not addressed within the Environmental Impact Assessment, which fails to evaluate the impact of such lighting on visual amenity, landscape character, and the experience of residents and visitors. The absence of this analysis is particularly concerning given the rising importance of dark skies for the area's identity and the growth of astro-tourism.

Moreover, there is a lack of assessment regarding the potential effects of the lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risks of collision. The

application notably does not include any evaluation of lighting impacts or a phototaxis study, which are essential for understanding how aviation lighting might influence these species and contribute to increased mortality rates.

This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks that come with artificial light. For instance, Kittiwakes may forage or migrate at night and are susceptible to disorientation from such lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant void in comprehending the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard necessary 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 contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the overall ecological context.

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

TOURISM

The application does not adequately assess tourism impacts, which are crucial for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and feeling of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantitative analysis regarding 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 increased considerably, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not evaluate how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the wider economic resilience. Without this analysis, it remains unclear if the development would benefit or harm this growing sector.

Additionally, the assessment neglects to take into account the significance of environmental quality in fostering 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 considerable gap in understanding the impacts on a vital and expanding aspect of the local economy.

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

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

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic reliance create a significant evidential gap. This limits a thorough evaluation of economic effects and leads to the conclusion that the application lacks completeness.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary standards for sustainable development when evaluated against national policy, statutory duties, and evidential standards. It brings back the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

However, the application lacks a complete and trustworthy evidential basis for evaluation. There are significant gaps in baseline data, the design envelope is not clearly defined, and there is an over-reliance on unspecified mitigation measures. Furthermore, important impact pathways, such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications, have been excluded. Consequently, the Environmental Impact Assessment is not thorough enough to fully understand potential significant effects or remaining impacts.

Moreover, the process has clear procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

The proposal is also at odds with National Planning Framework 4. It does not

adequately protect biodiversity, natural areas, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot prove a net economic benefit due to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects with reasonable scientific certainty has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause considerable and irreversible changes to a highly sensitive landscape. Industrialising the Atlantic-facing coastline, losing dark skies, disrupting cultural and visual connections, and negatively affecting tourism represent permanent impacts that cannot be adequately mitigated.

When considering all these factors, the application is procedurally and substantively unsuitable for determination. The significant gaps in information, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority should either refuse consent on these bases or employ the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

Personal Statement: Objection to Offshore Windfarm Development in Scottish Island Waters

As a fellow Scottish Islander—born on these shores, raised with the tide as my clock, having lived and worked amongst these waters—I object to the proposed offshore windfarm development. The islands have always contributed to Scotland's energy needs, but not at any cost, and not without honest assessment. On the following grounds, this proposal fails our islands and our marine inheritance.

1. ENVIRONMENTAL IMPACT ASSESSMENT (EIA) ADEQUACY

The EIA is simply not fit for island waters. It uses broad-brush modelling that takes no account of localised tidal races, narrow sounds, and the way our seabed changes from one mile to the next. Key surveys were done in a single season, missing wintering behaviours of marine life. For islanders who have watched developers come and go, this feels less like assessment and more like box-ticking.

2. ASSESSMENT OF ALTERNATIVES

The developer has not genuinely considered island-relevant alternatives. What about

community-led offshore renewables on a smaller scale? What about accelerating interconnector capacity so existing island wind and hydro can be fully utilised before industrialising new seabed? Shallow-water megaprojects are the easy option for outside developers; they are not the only option for islanders who know these waters intimately.

3. MARINE ECOLOGY AND PROTECTED SPECIES

Our inshore waters are not generic marine habitat—they are calving grounds for harbour porpoise, feeding corridors for common dolphin, and the last refuge of flapper skate. Pile driving echoes through sea lochs and narrow channels, carrying for miles. The noise does not simply “disturb” marine life; it drives mother-calf pairs away from sheltered waters. We see the difference an absence of wildlife makes. That difference becomes permanent.

4. ORNITHOLOGY AND SEABIRD IMPACTS

Island seabird colonies are already collapsing. Kittiwake numbers on our cliffs are down by two-thirds in a generation. Arctic tern, our summer neighbour, struggles. Adding collision risk and displacement from feeding grounds is not precautionary—it is negligent. The EIA’s collision models assume birds avoid turbines. But on fog-bound mornings (common here), they do not. We know this because we see what washes ashore.

5. CULTURAL HERITAGE AND COMMUNITY IDENTITY

An islander’s identity is not separate from the sea—it is made of it. Our Gaelic place names describe every rock, eddy, and skerry. Our songs remember old wrecks and safe passages. A windfarm industrialises the very horizon that our grandparents watched for returning fishing boats. This is not nostalgia. It is the recognition that when you industrialise an island seascape, you unmake something that cannot be manufactured again.

6. SOCIAL IMPACTS, HEALTH, AND WELLBEING

We lived close to the sea. It was not an accident—it was a choice for wellbeing. Low-frequency vibration from turbines travels through water and into bedrock, reaching houses on shorelines in ways mainland studies routinely miss. Add to that the anxiety of losing a view that has steadied islanders through storms, bereavements, and long winters. Mental health on islands is fragile. This project dismisses that fragility.

7. SEASCAPE, LANDSCAPE AND VISUAL IMPACTS

From island to island, we see each other’s skylines. A turbine array visible from three different island ferry routes, two National Scenic Areas, and several scheduled monuments does not “share the load”—it overwhelms the seascape. Visitors come to see a horizon uninterrupted by industry. So do we. That horizon is not a luxury; it is the signature of island life.

8. CONSTRUCTION AND POLLUTION RISKS

Construction will bring heavy vessel traffic through narrow island sounds that are already hazardous in winter. A single fuel or hydraulic oil spill in a tidal race will spread

through an entire island group's fishing grounds and seal haul-outs within hours. The EIA calls this low risk. Islanders know that on these waters, "low risk" is a mainland accountant's phrase for "not their shore."

9. FISHERIES AND MARINE LIFE

Small-scale island creel fishing for brown crab, lobster, and scallops does not relocate easily. When turbines close grounds, boats crowd into remaining sheltered waters—exactly where juvenile fish shelter. Electro-magnetic fields from export cables may affect spider crab behaviour, poorly studied. For island crofters who still supplement income with a few creels, losing access is not a minor inconvenience. It is the end of a tradition.

10. ONSHORE INFRASTRUCTURE: HIDDEN IMPACTS

The focus stays on offshore turbines, but the real island cost is onshore: cable landfall on a machair (grassland above a beach) of rare botanical interest; a substation covering two acres of common grazings; and temporary hardstanding for kilometres of cable route across peatland that stores carbon for millennia. Each hidden impact is permanent. The EIA treats them as temporary. That is false.

11. DARK SKIES AND NOCTURNAL WILDLIFE

Our islands are among the last places in Scotland with genuinely dark skies—no city glow, no motorway lighting. Offshore turbine aviation lighting will introduce a permanent artificial glow along every clear night horizon. Storm petrels, which nest in island stone walls and forage at sea in darkness, are known to be disoriented by artificial light. We do not yet know the full cost. That alone should stop consent until we do.

12. TOURISM

Island tourism is not coach tours and souvenir shops. It is wildlife watching, sea kayaking, wild camping, and the quiet offer of solitude. Travellers do not cross the Minch to watch flashing red lights on an industrial skyline. Evidence from other island communities shows that "renewables tourism" rarely replaces lost nature-based visitor spend. Our inns, B&Bs, and small ferries rely on the latter. This project puts them at risk.

Conclusion

I do not object to renewable energy. The Scottish islands have powered this nation for generations—first with kelp, then with fish, now with wind. But we object when development arrives without proper assessment, without respect for island ecology, and without honest accounting of hidden costs. I ask that this application be refused. If energy from our waters is to be taken, it must be taken fairly, carefully, and with an assessment worthy of the islands themselves. This proposal is not there yet.

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: 30818F97

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 is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the proposal. The flexible Project Design Envelope used lacks commitment to specific

turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data all contribute to rendering the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed application exhibits significant shortcomings in the assessment of alternatives, failing to meet the statutory obligations of the Environmental Impact Assessment regime. It does not offer a structured and reasoned comparison of realistic alternatives based on their environmental impacts. Instead, it presents a narrative detailing the evolution of the project, which does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging alternatives.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not illustrate that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. This is particularly pertinent given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in determining impact. The failure to provide such analysis obstructs any conclusion that the proposed location constitutes the least damaging choice.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, coupled with the absence of comparative analysis, indicates that mitigation by design has not been effectively implemented, resulting in an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority from ascertaining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal is sustainable or aligns with policy requirements.

From a policy viewpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community well-being. The absence of a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been adequately evaluated and does not warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to provide a comprehensive and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region is known for its sensitivity and biological activity, yet the existing baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat usage of local species. Consequently, the assessment lacks a credible evidential basis for evaluating potential impacts.

A significant oversight in this assessment concerns otters, which are recognised as a European Protected Species. The application does not adequately identify or evaluate their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts of construction disturbances, noise, and increased human activity.

As a result, the conclusions drawn regarding the absence of significant effects on this species are compromised.

Further issues are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces a notable detection bias, particularly in the challenging conditions of the Atlantic. This methodology is prone to underestimating their presence, especially in light of established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or give due consideration to this vital data results in a flawed baseline, undermining the reliability of the conclusions reached.

The aforementioned methodological deficiencies lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This gap in understanding introduces uncertainty regarding the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to fulfil the criteria set out in the Environmental Impact Assessment framework and the National Planning Framework 4, as it does not properly identify or assess protected species. The level of uncertainty generated by these omissions precludes the ability to dismiss adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal contradictions that weaken its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence to demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

A critical inconsistency within the application emerges as the developer asserts that no significant adverse effects are anticipated while simultaneously progressing a Habitats Regulations derogation case, which is only required if significant harm is expected. This contradiction raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the

assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly addressed, and the reliance on modelling methods introduces uncertainty, particularly concerning species in severe decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential standard required to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and modelling issues, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent. Moreover, the deficiencies noted represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These inadequacies hinder a robust evaluation of impacts and reinforce the conclusion that the application fails to meet the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

The assessment also overlooks intangible cultural heritage, such as the Gaelic language and traditions, along with the deep connection between the community and the coastal environment. These aspects are vital to the identity of the area and their

absence signifies a significant omission. Without addressing these factors, the cultural impact of the development cannot be accurately assessed.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups involving local residents, yet the complete report has not been made available to the public. This omission creates a significant evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified through the developer's own investigations.

Residents have expressed measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposal, as evidenced by direct engagement rather than speculation. However, the failure to disclose the comprehensive assessment limits the opportunity for proper scrutiny of these findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor given the appropriate weight they warrant. The withholding

of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and function may be jeopardised. The absence of the full dataset results in an application that fails to present a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and avert harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it cannot be proven that the application complies with this policy.

The procedural implications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, combined with evidence of existing adverse impacts, renders the overall assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped character. This development would create a dominant industrial presence that would fundamentally alter the area's existing character, resulting in a permanent transformation of the landscape that cannot be mitigated.

The assessment of seascape, landscape, and visual impacts is significantly deficient, failing to adequately convey the scale of visual change anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and coastal locations frequently used by the public. This alteration would directly impact visual amenity and diminish the natural qualities that define the area. Furthermore, the assessment does not reflect the significance of these impacts in relation to the sensitive landscape.

Methodological issues are also apparent in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises

the possibility that the assessment has underestimated the magnitude of visual impact, thereby compromising its reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. The current assessment treats these sites as isolated entities, failing to acknowledge their interdependence and thereby resulting in an incomplete evaluation of the impacts on their cultural significance.

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

From a policy standpoint, the proposed development conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment weakens any assertions of compliance with policy guidelines.

The impacts identified are clearly not capable of effective mitigation. Due to the height, scale, and proximity of the turbines, their presence would be unavoidable and dominant. Thus, the resulting change to the landscape is not merely significant; it is fundamental and permanent.

In conclusion, the assessment fails to accurately represent the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These deficiencies inhibit a reliable evaluation and affirm that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is significantly lacking, which hampers the ability to assess the likely environmental impacts. The proposal involves considerable seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises alarms given the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are at risk from sediment disruption and contamination. While the application acknowledges potential hazards, including

sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on how such incidents will be prevented, managed, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application undermines the ability to evaluate whether adequate safeguards exist to address pollution events. This creates procedural risks and diminishes the capacity of the competent authority to properly assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies are evaluated prior to consent; without this information, a lawful determination cannot be reached. Additionally, the application fails to illustrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a

considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a complete assessment of the onshore infrastructure, failing to consider the full range of impacts from this integrated project. It treats the offshore turbines and onshore works as separate entities, leading to a fragmented evaluation that obscures the overall environmental and socio-economic effects.

Key onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and 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 lack of a comprehensive assessment of these impacts prevents a clear understanding of the project's environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are examined together, yet the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks also exist for sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a clear gap in evidence regarding biodiversity protection.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence that necessary consents or processes have been initiated, raising concerns about the project's deliverability and lawful implementation.

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

In summary, the division of project components, the lack of a comprehensive assessment, and insufficient evidence on environmental and land use impacts make this section of the application incomplete and unreliable, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment. The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, overlooking the significance of dark skies for the area’s identity and emerging tourism sectors such as astro-tourism.

Moreover, there is a troubling absence of any 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 due to their phototactic responses, which may lead to disorientation and increased collision risks. The application does not include any lighting impact assessment or phototaxis study, meaning it neglects to assess how the proposed aviation lighting could affect these species or contribute to mortality rates.

This lack of assessment is further exacerbated by the reliance on daytime survey data within the ornithological assessment, failing to capture nocturnal activity and associated risks. 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 results in a critical gap in the understanding of ecological impacts.

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

From a policy perspective, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, this lack of evaluation undermines the broader assessment of landscape and seascape impacts, as night-time character is integral to the environment.

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

TOURISM

The application significantly overlooks the assessment of tourism impacts, which is crucial for the Isle of Lewis. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and a sense of remoteness. It is noted that 86% of visitors are attracted by the scenery, yet there is no quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle has expanded notably, rising from £65 million in 2017 to more than £81.5 million, and supports over 1,000 jobs, making up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and overall economic resilience. Without this crucial analysis, it remains unclear whether the development would provide a net economic benefit or harm an established and growing sector.

Furthermore, the role of environmental quality in fostering tourism has not been considered. Unspoiled landscapes and dark skies are essential for visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on an important and expanding part of the local economy.

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

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

Overall, the lack of quantification of tourism impacts, the neglect of environmental

influences on visitor behaviour, and the failure to consider the island's economic dependency contribute to a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its adherence to the principles of sustainable development as measured against statutory requirements, national policy, and evidential standards. It echoes the critical issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This current application, despite being presented under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a complete and reliable evidential basis for decision-making.

There are notable deficiencies in the baseline data provided, including the use of an undefined design envelope and the reliance on unspecified mitigation measures. Key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked, rendering the Environmental Impact Assessment incomplete. This lack of thorough analysis inhibits a comprehensive understanding of the likely significant effects and residual impacts.

In addition to the evidential gaps, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly contradicts the National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, or cultural heritage. It fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to inadequate tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been assessed properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain ambiguous and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion that impacts can be considered acceptable.

Moreover, the proposal would cause significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark

skies, disruption of cultural and visual connections, and detrimental effects on tourism represent enduring impacts that cannot be adequately mitigated.

In conclusion, 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. Therefore, it is essential that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory provisions to mandate the submission of the missing information. A formal request is thus made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

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: C34DC74A

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis for a lawful determination. There is a noticeable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined. The employment of a flexible design framework hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims made regarding negligible or non-significant effects are not substantiated by robust evidence.

The proposal also presents clear and substantive conflicts with existing policy frameworks. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity are being met. These policy conflicts are directly relevant to the statutory tests required for consent and significantly undermine the ability of the competent authority to determine that the development is policy-compliant.

The scale of the proposed wind farm is unprecedented for this location, with large turbines proposed to be installed in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and evident non-compliance with policy indicate that the application is incomplete and fails to support a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a complete, transparent, or reliable evaluation of the proposal's likely environmental impacts. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and makes it impossible to consistently apply a worst-case scenario, thus obscuring the true extent of environmental effects and hindering both public understanding and the competent authority's ability to make informed decisions.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed later obstructs any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This postponement of critical information until post-consent stages is procedurally unacceptable and contradicts the aim of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly identified before determination.

The application also suffers from considerable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of the impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The deficiency of sufficient 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 meet the evidential standards required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a transparent analysis based on environmental effects, it offers a narrative account of project development. This omission indicates that the identification, assessment, and selection of less harmful

options in preference to more damaging solutions have not been adequately conducted.

Furthermore, there is a notable lack of evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the possibility of placing turbines further offshore has been seriously evaluated, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the significance of proximity to the shore in assessing impact, underscores the importance of this analysis. Without it, one cannot conclude that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with the lack of comparative analysis, suggests that mitigation by design has not been applied, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to assess whether more appropriate and less harmful alternatives exist. The lack of a robust alternatives assessment ultimately raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency 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 oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant gap exists in the consideration of otters, which are a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. Without proper assessment of their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity remain unexamined. This lack of thorough evaluation undermines

claims regarding the absence of significant effects on otters.

Moreover, the evaluation of basking sharks also presents shortcomings. The reliance on aerial surveys introduces a detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. Established land-based observations show frequent usage of these waters, which were not adequately considered in the assessment. This omission results in an incomplete baseline and undermines the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. The absence of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk to marine species and their habitats.

From a regulatory standpoint, the application does not meet the standards set 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 the deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, raising serious concerns about its reliability. It presents significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. Yet, the application fails to demonstrate to the necessary evidential standard that these species will not face adverse effects. Key foraging areas and migratory pathways, which are critical to these birds, are not adequately evaluated in terms of displacement, collision risk, or habitat loss.

A critical contradiction arises in the application itself, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only applicable if significant harm is anticipated. This inconsistency raises serious questions about the assessment's validity and suggests that the conclusions drawn are unsupported by the actual evidence presented. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is not properly acknowledged, and the reliance on modelling introduces further uncertainty, especially concerning

species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain inadequately understood.

Additionally, the positioning of turbines within a recognised migratory corridor presents another substantial risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and potential effects on species with relatively small global populations are not sufficiently assessed by the application.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, prevents the standard of beyond reasonable scientific doubt from being achieved. This invokes the precautionary principle, which should inhibit a lawful conclusion in favour of consent.

The identified deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The lack of evidence to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, particularly regarding the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. This application adopts a simplistic view, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the handling of significant cultural sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active places of burial and spiritual practice. The assessment's failure to account for their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and ignores their essential role in community life.

Furthermore, the evaluation neglects intangible aspects of cultural heritage such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity yet are

entirely overlooked in the assessment, representing a significant gap. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Community rights and engagement also raise serious concerns. The Gaelic-speaking population has a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. Such a gap alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with living cultural practices, clearly deviates from policy requirements.

Overall, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding 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 West Lewis coastline is characterised by its open Atlantic horizon and its undeveloped nature, evoking a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts in the application is materially deficient, failing to adequately represent the scale of change or the sensitivity of this unique environment. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not fully capture the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys this level of impact and its significance within such a sensitive landscape.

Methodological issues are evident regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This risk of understatement undermines the reliability of the visual impact assessment.

A significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these assets in isolation, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on undefined future measures is particularly concerning due to the sensitivity of the receiving environment. The West Lewis coastline, known for its clean

coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

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

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

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

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

There is a notable inconsistency in the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet impacts are described as negligible. This contradiction raises questions about the reliability of the assessment and compliance with the Habitats Regulations, especially regarding anticipated harm that may require legal authorization.

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

From a policy standpoint, the application does not prove compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that this proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts from what constitutes a single integrated project. The offshore turbines are closely linked to the onshore works, yet they are assessed separately, leading to a disjointed approach that masks the true extent of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Excavation in areas of deep peat, especially within Barvas Moor, poses risks to a significant carbon store and ecologically sensitive habitat. The application falls short by failing to provide a detailed assessment of these impacts, which obstructs a full understanding of the project's overall environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process requires that all aspects of a project be considered collectively. However, the disconnection between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to renewable energy development goals. The application fails to address this issue sufficiently or prove that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, leading to doubts about the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any assessment of dark skies and nocturnal wildlife, which constitutes a significant evidential gap. The proposal, situated along the West Lewis coastline, would introduce permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, which is characterised by exceptionally dark skies that contribute to the area's environmental quality, cultural identity, and tourism value.

Moreover, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors, despite the significance of dark skies to the area's identity and the potential for emerging tourism sectors like astro-tourism. The lack of assessment in these areas reflects a clear gap in the overall landscape and environmental evaluation.

Critically, there is no examination of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can cause disorientation and increase collision risk. The application lacks any lighting impact assessment or phototaxis study, failing to address how aviation lighting could adversely affect these species or lead to increased

mortality.

This omission is further 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 risk has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding ecological impacts.

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

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

In summary, the absence of any evaluation of dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination, highlighting the critical need for baseline data, impact modelling, and species-specific analysis.

TOURISM

The assessment provided on the impacts of tourism is fundamentally lacking, failing to address the economic and social ramifications for a vital sector of the Isle of Lewis's economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and a profound sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not offer any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Significantly, the tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, with more than 1,000 jobs supported and accounting for up to 16% of the island's economy. However, the application neglects to model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would provide a net economic benefit or harm an already established and flourishing sector.

The assessment fails to recognise the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further

exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and expanding segment of the local economy.

For an island community that lacks extensive economic diversification, the inadequate evaluation of tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community as a whole. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding the economic impact and the necessity to establish a net benefit. Furthermore, it contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough assessment of economic effects, ultimately leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential benchmarks. It echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was determined, yet it is now introduced under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential foundation for determination, characterised by critical gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and omissions regarding key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, failing to

demonstrate the protection of biodiversity, natural areas, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, leaving effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would impose substantial and irreversible changes on 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 permanent effects that cannot be mitigated to an acceptable degree.

When considering these factors collectively, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must refuse consent 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: B7D789ED

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

Dear Sir/Madam

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

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

Moreover, there are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in ambiguity concerning the scale and significance of impacts, especially where negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to satisfy requirements relating to biodiversity protection and environmental integrity, as it cannot confirm that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

Overall, the combination of reliance on an unspecified design envelope, lack of defined mitigation measures, and the gaps present in baseline data contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to a materially inadequate assessment of alternatives. Instead of providing a well-structured and reasoned comparison of realistic alternatives based on environmental effects, it offers a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

The assessment lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an action that could potentially reduce visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the significance of proximity to shore in determining impact highlight the inadequacies in this analysis, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies are evident in cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, indicates a failure to apply mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight signifies a failure to adhere to the established mitigation hierarchy, thereby limiting the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been thoroughly evaluated and cannot sustain a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors present. This marine system is known for its high sensitivity and biological activity. However, the baseline data is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A significant oversight is the assessment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the potential effects of construction disturbances, noise, and increased activity. This gap undermines any claims regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the methodology relies on aerial surveys that carry inherent detection biases, particularly under Atlantic conditions. This approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or appropriately assess such data contributes to an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues result in assertions of negligible or non-significant effects being grounded in assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has inadequately identified and assessed protected species. The uncertainty created by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively undermine the reliability of the assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

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

There exists a significant contradiction within the application. The developer concludes

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are essential as active places of burial and spiritual practice. Unfortunately, the assessment reduces these vital sites to static features, ignoring their continued use and meaning, as well as the impact of development on their settings. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Furthermore, there is a notable absence of consideration for intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing connection between the community and the coastal environment. These elements are central to the area's identity yet remain entirely overlooked in the assessment, representing a significant gap. Without their inclusion, the cultural impact of the development cannot be fully understood.

Community rights and engagement are also significant concerns. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

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

Collectively, 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 proposed development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment has raised significant concerns, as it lacks the necessary transparency for a lawful evaluation. While the developer engaged with local residents through focus groups, the full report has not been published. This gap in available information hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing tangible stress, anxiety, and concern linked to

the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not merely speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of the findings, limiting the ability to assess their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal threatens community identity and cohesion, with “cultural loss” identified within the developer’s findings. Nonetheless, these impacts have not been adequately integrated into the main application or given the necessary attention. The lack of a full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The absence of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application lacks a robust evidential basis to assess the balance between benefits and harms.

From a policy perspective, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and avoid harm, yet available evidence suggests adverse effects that remain undisclosed. Without 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 conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material deficiency in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This compromises the capacity for a lawful determination and reinforces the view that the application is not backed by adequate information.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks raises significant concerns regarding its ability to adequately evaluate potential environmental effects. The proposed works, which entail considerable seabed preparation and installation within a dynamic Atlantic environment, lack fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application suggests relying on mitigation and contingency measures that would be formulated after consent has been granted. This approach undermines any thorough assessment of the proposed measures' adequacy or effectiveness.

The sensitivity of the receiving environment further exacerbates these issues. The West

Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats, which have been 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 is granted, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address potential pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferment of essential environmental safeguards conflicts with the requirements stipulated by the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to granting consent; when this information is absent, 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 absence of defined mitigation measures, the lack of comprehensive management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application is fraught with significant deficiencies that directly impact marine ecosystems and local fishing industries. There is an alarming lack of a thorough evaluation regarding the ecological and socio-economic impacts on the diverse marine life and active fishing operations off the West Lewis coast. The assumption that fishing activities can be displaced without repercussions is particularly concerning. No evidence is presented to indicate the availability or accessibility of alternative fishing grounds, nor is there any indication that these grounds could support the additional fishing pressure, raising the risk of overfishing elsewhere and jeopardising the local fleet's economic stability.

Moreover, the proposal poses considerable risks to marine species, especially from the underwater noise created during construction. The anticipated high-energy hammer

piling is likely to cause extensive disturbance, potentially affecting a significant portion of the local bottlenose dolphin population. Despite the gravity of these predictions, the application downplays the severity of such impacts, lacking sufficient supporting evidence.

Additionally, the application contains an internal inconsistency that warrants immediate scrutiny. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction not only undermines the credibility of the entire assessment but also raises serious questions about compliance with the Habitats Regulations, particularly when anticipated harm demands legal authorisation.

The failure to assess cumulative impacts is another critical shortfall. The assessment does not adequately consider the combined effects of habitat disturbance, noise pollution, and the displacement of fishing activities. This omission severely hampers the ability to ascertain the overall implications for marine ecosystems and the socio-economic conditions of the area.

From a policy perspective, there is a clear non-compliance with both the National Planning Framework 4 and the National Marine Plan. The application does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus undermining the conclusion of sustainable development.

In summary, the myriad of deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on fisheries and marine life, necessitating immediate action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure linked to the offshore turbines is incomplete and does not fully capture the impacts of what is essentially a single integrated project. The offshore and onshore components are assessed independently, leading to a fragmented analysis that fails to reveal the true scale of the environmental and socio-economic consequences.

The onshore works involve cabling through protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Notably, excavation is planned in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which limits understanding of the overall environmental footprint of the project.

By not fully considering onshore impacts, the application undermines the assessment of cumulative effects. The Environmental Impact Assessment process mandates that

all project components be evaluated together; however, the separation of offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application does not convincingly demonstrate that impacts on these vital habitats have been comprehensively assessed or that appropriate avoidance measures are in place. This results in a significant gap concerning biodiversity protection.

Concerns also arise around carbon balance due to the disturbance of peatland, which could release stored carbon and potentially create a carbon debt that contradicts renewable energy development goals. The application fails to adequately tackle this critical issue or to show that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide sufficient evidence that necessary consents or processes have been initiated, which brings into question the project's deliverability and lawful implementation.

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

In summary, the division of project components, the absence of comprehensive impact assessment, and the insufficient evidence regarding environmental and land use implications render this section of the application both incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably lacks any examination of dark skies and nocturnal wildlife, which is a serious omission. The West Lewis coastline is renowned for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, creating an intrusive "wall of light" effect along the western horizon and fundamentally changing the night-time landscape.

Furthermore, the application fails to evaluate how this lighting will impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly significant considering the crucial role dark skies play in the local identity and the growth of tourism sectors such as astro-tourism. The neglect of these issues indicates a clear deficit in the overall landscape and environmental evaluation.

More concerning is the lack of analysis regarding the effects on nocturnal wildlife.

Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means there is no consideration of how aviation lighting could impact these species or heighten 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 dangers. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data results in a significant gap in understanding the ecological implications.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural environments and the preservation of environmental quality. Additionally, they weaken the overall assessment of landscape and seascape impacts since the character of night-time environments is a vital aspect of the ecological landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a considerable evidential shortfall. The lack of baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts is significantly lacking and does not evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism is inherently reliant on the wild coastline, near-pristine landscape, dark skies, and sense of remoteness that the area offers. The application notes that 86% of visitors are attracted by scenery; however, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while accounting for up to 16% of the island's economy. Yet, the application does not model the potential effects of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without such analysis, it remains unclear whether the development would produce a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in tourism, specifically the significance of unspoiled landscapes and dark skies for visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a substantial gap in understanding the impacts on a recognised and growing part of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the failure to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This hampers a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application's inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it

provide evidence of a net economic benefit, largely due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be 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, and disruption of cultural and visual relationships would result in permanent effects that cannot be mitigated to an acceptable level.

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the 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 be refused in its entirety.

Additional Comments

This project is very close to my home. Far too close. The infrasound effects will have an impact on my mental and physical well being. The lights will also have a negative effect. The project plan is far too near the shoreline. The affects of the wind turbines working will impact up to at least 10k. So much of the effects in the short and long term of infrasound is yet unknown but enough information is available now to make an informed decision that it has a negative effect on mental and physical well being. The wind turbine height and the number are out of all proportion to the size of the island. The beauty and tranquility of the environment and the land and sea scape around me will be forever lost. For what? The dwellings all along this coastline will be devalued and worthless. Who would want to buy a property anywhere near a shoreline with huge hulking turbines? I have personal experience of the noise pollution of three land turbines that are minute compared to the turbines that will be built offshore. They are noisy and can be heard cranking away. It becomes an ear worm.

The rape and destruction if the Ramsar site is sacrilege. I do not believe for one moment that a cable will be used. It will be pylons. If the project is granted permission to go ahead can it be guaranteed that a cable will be put in place with every possible safety measure to prevent fire, explosion etc.

The golden and fish eagles and the red dipper are also going to be sacrificed as well as all the other birds and mammals.

Finally, as far as I can establish a Health Equality Impact Assessment is not available. I have tried on a number of occasions to acquire a copy. With the scale of this proposed development I view the absence of said document as a dereliction of your duty.

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: E24CA532

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The objection is rooted in an examination of the Environmental Impact Assessment Report and the associated documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. Essential environmental data is absent, baseline information is not only limited but also inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework employed fails to allow for a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unverified. Consequently, the available documentation does not afford a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust substantiation.

There are evident and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate concerns, and environmental integrity. These conflicts directly impact the statutory requirements for consent and compromise the ability of the competent authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the project, with large turbines positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is imperative that the precautionary principle is invoked.

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 lack of a thorough and evidence-based assessment of alternatives severely undermines the application's compliance with the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative of project evolution that fails to demonstrate that the developer has identified and considered less harmful options in favour of more damaging solutions.

There is no transparent comparison of offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated placing turbines further offshore, where the visual, ecological, and coastal impacts might be significantly lessened. The sensitivity of the West Lewis coastline, coupled with the crucial importance of proximity to shore in assessing impact, highlights the significant oversight in not including this analysis, thus making it impossible to conclude that the proposed siting is the least damaging option available.

Moreover, this inadequacy extends to the evaluation of cable routing and landfall. There is little evidence that alternative routes have been adequately explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The failure to provide a clear strategy for avoidance and the absence of comparative analysis suggest a neglect of mitigation by design, with an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight represents a significant failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or in accordance with policy.

From a policy standpoint, this significant deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a critical omission that leads to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to offer an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species, compromising the assessment's ability to evaluate potential impacts reliably.

A significant shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to fully acknowledge and assess their active usage of coastal regions for foraging and movement. This oversight, particularly regarding their core foraging range and behavioural patterns, means that the possible effects of construction disturbances, such as noise and increased human activity, have not been adequately evaluated. Consequently, the conclusions drawn about the absence of

significant effects on otters are undermined.

Moreover, the assessment of basking sharks is flawed, with reliance on aerial surveys leading to considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that suggest frequent usage of these waters. The failure to integrate or properly consider this data results in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment framework or National Planning Framework 4, as it has not adequately identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects with reasonable scientific certainty, thereby invoking the precautionary principle. Under these circumstances, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The application fails to meet the evidential threshold required to demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This area supports many seabird species that are already in decline. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate displacement, collision risk, or habitat loss.

There is a fundamental contradiction in the application. The developer concludes that there are no significant adverse effects, while also advancing a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions presented lack support from the evidence. The assessment fails to provide 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 thoroughly considered, and the reliance on modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly in

light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk by potentially creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal presented fails to adequately assess cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape that intricately links environment, language, tradition, and community. The assessment adopts an overly simplistic view, treating heritage as a collection of separate, static assets instead of recognising their continuing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are addressed. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use and meaning, as well as the potential impacts of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural implications and disregards the sites' importance in community life.

The intangible aspects of cultural heritage are also not considered, with the assessment omitting critical elements like the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These factors are vital to the area's identity, yet their exclusion signifies a major oversight. Without addressing these elements, the cultural impact of the development remains inadequately assessed.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of genuine engagement calls into question the credibility of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

Furthermore, a significant procedural error arises from the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without such an assessment, the relevant authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This oversight alone renders a lawful determination impossible.

From a policy standpoint, the deficiencies in the application are at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear breach of policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and essential statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, and the application does not provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included engagement with local residents through focus groups. However, the full report has not been published, leading to a significant evidential gap that hinders public understanding and the competent authority's ability to assess social risks identified in the developer's research. Available summaries reveal that local 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 not speculative, yet without the full assessment, there is limited capacity for proper scrutiny of these findings, making it difficult to ascertain their significance in the decision-making process.

Moreover, the development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, such impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this nature, especially when they may affect community character and functioning. The failure to provide the full dataset results in an application that lacks a comprehensive

evidential basis to weigh the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, existing adverse effects have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible. The procedural implications are profound, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission signifies a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable, which ultimately obstructs a lawful determination and supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately portray the magnitude of the visual impact. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby affecting visual amenity and diminishing the qualities that define naturalness and remoteness. Furthermore, the assessment does not convey the true level of impact or its significance within such a sensitive landscape.

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

Additionally, the application fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these assets in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these critical relationships, altering the context in which heritage assets are experienced and disrupting their connection to

the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately addressed within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This insufficiency hinders a thorough assessment of potential environmental effects, relying instead on unspecified mitigation and contingency measures to be developed after consent, which prevents a meaningful evaluation of their sufficiency.

Particularly alarming is the absence of detailed emergency response procedures, which exacerbates concerns about environmental protection. By postponing contingency planning until after consent, the application hinders the ability to assess whether adequate safeguards are in place for pollution incidents, introducing procedural risks that compromise the competent authority's evaluation of environmental measures at the determination stage.

The coastline of West Lewis is known for its clean coastal waters and vital habitats, which are at risk of disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental spills, it does not present enough information on prevention, control, or monitoring strategies. Furthermore, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations complicates the assessment. Without robust modelling and clearly articulated management approaches, the ecological effects, duration, and extent of these impacts cannot be accurately determined.

From a regulatory viewpoint, the lack of defined mitigation measures and detailed

management strategies raises serious concerns about compliance with the Environmental Impact Assessment regime. The assessment of significant effects and mitigation must occur before consent, and absent this information, a lawful determination becomes unattainable. Collectively, these deficiencies render the assessment materially inadequate, obstructing a thorough review of construction and pollution risks, and further affirm the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of marine life and fisheries. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital habitats and uses can be safeguarded from disruption.

A major flaw in the application is the assumption that fishing activities can be shifted without negative consequences. There is no evidence presented that alternative fishing grounds exist or that they can support the pressure from displaced activities. This is a crucial gap, as such displacement may lead to overfishing in other areas, potentially impacting the local fishing fleet's economic viability. Without a thorough assessment based on evidence, understanding the implications for fisheries and local livelihoods remains incomplete.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise from construction activities. The use of high-energy hammer piling for an extended period is likely to disturb marine life over considerable distances, which could affect species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application appears to minimise these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application. While it acknowledges the need for licenses to allow harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction questions the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially in cases where harm necessitates legal approval.

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

In terms of policy compliance, the application does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies render the assessment

incomplete and unreliable. These issues hinder any robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of onshore infrastructure is fundamentally lacking and does not encompass the full range of impacts that stem from a singular integrated project. The offshore turbines and the onshore works are closely interconnected; however, they are being assessed in isolation, leading to a disjointed approach that masks the actual magnitude of environmental and socio-economic repercussions.

Among the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through fragile landscapes. These activities necessitate excavation in areas rich in deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to deliver a thorough assessment of these ramifications, hindering a complete understanding of the project's total environmental footprint.

Furthermore, the exclusion or postponement of onshore impact assessments obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively. However, the segmentation of offshore and onshore components results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not confirm that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, thereby leaving a significant evidential gap in terms of biodiversity conservation.

Concerns also arise regarding the carbon balance, as the disturbance of peatland releases previously stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently tackle this issue or establish that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on its deliverability and legal execution.

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

In summary, the disaggregation of project elements, the absence of a thorough assessment, and the insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the region's identity and the potential growth of sectors such as astro-tourism. This gap in the overall landscape and environmental assessment is substantial.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to consider how aviation lighting may affect these species or contribute to mortality rates.

This oversight is further aggravated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the broader assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall landscape.

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 means that the application remains incomplete and cannot support a lawful determination.

TOURISM

The assessment of tourism impacts lacks material depth and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

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

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a crucial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

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

Overall, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependencies creates a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is insufficient.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the 2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside conflicts with policy and

unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either reject this application on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

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

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: FC527FF5

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. There are concerns regarding the scale, proximity, and design of the proposal.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development needs to consider the impact on those who live on the island. Residents have expressed measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposal, as evidenced by direct engagement rather than speculation.

A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and function may be jeopardised.

It is essential for developments to foster positive health outcomes and avert harm, and therefore the the application needs to be able to prove it complies with this policy.

The assessment of the visual and landscape impacts associated with the proposed development needs to adequately convey the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic views, its undeveloped nature, and a profound sense of isolation. The planned installation of large turbines near the shoreline would impose an overwhelming industrial presence that would drastically alter this landscape, leading to a permanent and irreversible change in its character.

The industrialisation of the seascape would disrupt connections, changing the context in which these heritage assets are appreciated and breaking their link to the natural horizon. This not only results in visual impacts but also inflicts broader cultural and spatial damage.

These turbines will have a dramatic affect to the altered landscape of what is currently a scenic part of Scotland where many enjoy the peace and views of the surroundings. Having visited the Isle of Lewis a couple of times I can appreciate how the introduction of these will alter the sea and landscape particularly for those who this is their home and change the nature of the scenery for those who visit and value the areas tranquility also.

My sister in law's family live in close proximity to where these turbines will be situated and have stressed how this will affect their quality of life - particularly with the light, vibrations and noise, as well as the health implications because of this, particularly given how these are on a much larger scale than anything else similar.

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

Yours sincerely,

Mr Ash Raine

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: 6FEC565A

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or trustworthy account of the potential

environmental effects associated with the proposal. The incorporation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This diminishes the reliability of the assessment, making it difficult for both the public and the competent authority to grasp the true environmental impacts that may arise from the development.

The application also places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Therefore, the request for consent is predicated on the assumption that environmental harm will be addressed at a later stage. This approach obstructs any meaningful evaluation of the potential effectiveness of such measures or the assessment of residual impacts. Deferring key information to post-consent stages is not procedurally acceptable and contradicts the fundamental aim of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies must be clearly established before a determination can be made.

Further evidential deficiencies are apparent, including significant gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty surrounding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information compromises the ability to understand cumulative and worst-case impacts and introduces scientific uncertainties that are not aligned with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary 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 illustrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot justifiably determine the application based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and

reasoned comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

Consequently, the application does not sufficiently demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it cannot be claimed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system. However, the baseline data available is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a European Protected Species. The

application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means that the possible effects of construction disturbances, noise, and increased activity have not been sufficiently evaluated. Such omissions undermine any claims regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological choice is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or appropriately consider such critical data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings indicate that the conclusions asserting negligible or non-significant effects are predicated on assumptions rather than solid evidence. Moreover, the lack of adequate baseline data hinders any meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies makes it impossible to dismiss adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These weaknesses obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the overall finding that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. The application fails to demonstrate that these species will not be adversely affected, and this omission is particularly concerning given that the development is situated within key foraging areas and migratory pathways. The ornithological assessment is significantly flawed, containing considerable gaps in evidence and inconsistencies that undermine its conclusions.

A contradiction exists where the developer asserts there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency raises

doubts about the reliability of the assessment and suggests that its conclusions are not underpinned by solid evidence. Furthermore, the assessment does not provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling techniques adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially when baseline data is incomplete and the behavioural responses of the species are not fully understood.

The location of the turbines within a recognised migratory corridor poses an additional risk, essentially creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term consequences of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and limitations in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

Overall, the identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse impacts places the proposal in direct opposition to national policy. In conclusion, the assessment is deemed unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence, which together prevent a robust evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is lacking and does not recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are intertwined. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets without acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the way culturally important sites, like the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These sites serve as active places for burial and spiritual practice, yet the assessment reduces them to static elements, neglecting their continued significance and the potential effects of development on their surroundings. This mischaracterisation leads to a partial understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are essential to the area's identity but are missing from the assessment, which is a major oversight. Failing to consider these elements means that the cultural effects of the development cannot be accurately assessed.

There are additional issues surrounding community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with established principles of participation concerning cultural and environmental interests.

A significant procedural gap exists due to the absence of a proper Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these inadequacies put the proposal at odds with National Planning Framework 4, particularly regarding the protection of historical assets and locations. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly violates policy standards.

In summary, the lack of consideration for living heritage, intangible cultural value, community rights, and legal requirements creates a significant gap in the evidence. The cultural impacts of the development have not been properly evaluated, and the application lacks the necessary foundation for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern and undermines the integrity of the evaluation process. The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the full report has not been made publicly available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified through the developer's own research.

Residents are reportedly experiencing tangible stress, anxiety, and concerns regarding the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not merely speculative. Nevertheless, the lack of access to the complete assessment limits the scrutiny of these findings and hampers the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The failure to release the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially in contexts where community character and function may be at stake. By not providing the complete dataset, the application fails to establish a thorough evidential basis for evaluating the balance of benefits and harms.

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

The procedural implications of these issues are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material deficiency in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly lacking and does not adequately capture the degree of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to represent the extent of the visual change. Given their scale and closeness, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the level of this impact or its significance within the context of such a

sensitive landscape.

There are also concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the viewpoints may not fully reflect 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 may have been understated, undermining the assessment's reliability.

Additionally, the assessment does not consider the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape connected through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, rather than acknowledging their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any claim of compliance with policy.

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

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, 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 protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, which is particularly troubling given the environmental sensitivity of the West Lewis coastline. This area is known for its clean coastal waters and significant habitats, which are at risk from sediment disturbance and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide comprehensive information on how

these risks will be prevented, controlled, or monitored.

The proposal entails considerable seabed preparation and installation activities in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures that would only be formulated after consent is granted. This deferral is concerning, as it hampers any meaningful evaluation of the adequacy and effectiveness of these measures.

Further complicating the assessment 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 remains impossible to ascertain the extent, duration, or ecological consequences of such impacts. This uncertainty also raises questions about the potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs any assessment of whether sufficient safeguards will be in place to manage pollution events. This not only introduces procedural risks but also undermines the authority's capability to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the omission of vital environmental safeguards is in direct conflict with the stipulations of the Environmental Impact Assessment regime. Assessments of likely significant effects and required mitigations must occur prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policies that pertain to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts collectively render the assessment significantly deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life in the application is insufficient, lacking a robust evaluation of ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequence. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This omission is crucial, as such displacement poses a risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays the importance of these effects, lacking adequate supporting evidence.

There is an evident contradiction in the application, acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously describing such impacts as negligible. This inconsistency undermines the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, especially where harm is predicted to require legal authorisation.

Furthermore, the assessment neglects to consider 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, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which ultimately precludes any assertion that the proposal aligns with sustainable development.

The overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal suffers from a significant deficiency in the assessment of onshore infrastructure, failing to account for the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated separately, resulting in a disjointed approach that masks 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 near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and is an ecologically significant habitat. The current application lacks a thorough assessment of these impacts, thus obstructing a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application undermines the potential for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; nevertheless, the distinction between offshore and onshore elements obscures the comprehensive understanding of their combined effects on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, highlighting a notable evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide proof that requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to ensure the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further diminishes the reliability of the application.

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and untrustworthy, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife stands out as a critical shortfall in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the overall experience of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the region's identity and the emerging tourism sector focused on astro-tourism. As a result, the assessment presents a stark gap in the overall evaluation of the landscape and environmental effects.

The lack of evaluation extends to nocturnal wildlife, with no assessment provided for species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to artificial lighting. This failure to address the potential risks, including disorientation and increased mortality due to collision, is troubling. Furthermore, the ornithological assessment's dependence on daytime survey data fails to account for nocturnal activities and the associated dangers. Species like Kittiwakes, which may forage or migrate at night, remain vulnerable to disorientation from artificial lighting, yet this risk has gone unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological implications.

Without a proper assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard, which would exclude adverse effects beyond reasonable scientific doubt, cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions clash with National Planning Framework 4, particularly concerning the safeguarding of natural areas and the quality of the environment. Additionally, this neglect undermines the broader analysis of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Collectively, the absence of any evaluation related to dark skies and nocturnal wildlife signifies a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences 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. It is acknowledged that 86% of visitors are attracted by the scenery; however, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this 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 fails to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark

skies for visitor experiences and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a considerable gap in understanding the implications for a recognised and growing aspect of the local economy.

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

From a policy perspective, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not provide adequate evidence to enable the competent authority to assess the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and considering the island's economic dependency result in a substantial evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the statutory requirements for sustainable development as outlined in national policy and evidential standards. This proposal is reminiscent of the 2008 Lewis Wind Power application, which was rejected due to unacceptable levels of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not address the critical issues raised in the previous refusal.

Significant gaps exist in the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects render the Environmental Impact Assessment incomplete. As a result, the assessment fails to provide a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal contradicts the National Planning Framework 4, as it does not

demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to confirm that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain unclear and potentially significant. The assessments provided do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, which engages the precautionary principle and prevents a lawful determination that impacts are acceptable.

Moreover, the proposal is likely to 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 represent permanent changes that cannot be mitigated adequately.

In light of these substantive and procedural deficiencies, the application is unfit for determination. The combination of information gaps, policy conflicts, and unresolved environmental risks precludes a lawful, 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.

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

Additional Comments

I am against this proposal.

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: 5CBD0272

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. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated 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 scale and design of this proposal, along with its proximity to the shoreline, raise serious questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while significant aspects of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

Moreover, there are evident and significant conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not prove that it can fulfil national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal in this area, with large turbines situated close to the shoreline, raises major concerns about landscape capacity, visual impact, and overall environmental implications. The combination of inadequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy illustrates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or dependable evaluation of the likely environmental effects associated with the proposal. A critical issue is the adoption of a flexible Project Design Envelope, which lacks fixed turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the effective application of a worst-case scenario approach, thus compromising the reliability of the assessment. As a result, the impacts reported may not accurately portray what will be constructed, which obstructs both public understanding and the competent authority's ability to grasp the true scale of environmental effects.

There is a heavy reliance on undefined mitigation measures, monitoring strategies, and management plans within the application. Seeking consent based on the premise that environmental damage will be mitigated at a later date is unacceptable, as it inhibits any substantive evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be explicitly identified prior to any determination.

Significant evidential gaps are present, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than robust site-specific evidence. This lack of comprehensive information generates uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The insufficiency of information hampers the understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it fails to show 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, and substantial gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The methodologies employed in assessing marine ecology and protected species are fundamentally flawed, resulting in an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the incomplete baseline data means that the presence,

behaviour, and habitat use of various species have not been adequately captured. The implications of this are significant, as it undermines the validity of the assessment in evaluating potential impacts.

A critical oversight is evident concerning otters, a European Protected Species. The application does not properly acknowledge their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment fails to consider the potential effects of construction disturbances, noise, and increased activity on these animals. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a solid evidential basis.

The assessment of basking sharks also suffers from notable deficiencies, particularly due to the reliance on aerial surveys which introduces significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially in light of land-based observations that indicate these waters are frequented by the species. The disregard for such pertinent data results in an incomplete baseline and undermines the reliability of the conclusions drawn.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This fosters uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify and assess protected species introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, thus rendering the granting of consent unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the development is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. There is a critical failure to demonstrate that these species will not be adversely affected by the proposed development, which is situated within key foraging areas and migratory

pathways. The assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss for these seabirds.

A fundamental contradiction arises in the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, a process that is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment fails to provide sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly regarding species in critical decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and inadequate understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term implications of continued mortality within this corridor and fails to consider the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This necessitates the application of the precautionary principle, which hampers a lawful conclusion in support of consent. Additionally, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

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 proposal presents a significant deficiency in assessing the impacts on seascape, landscape, and visual aspects, failing to accurately reflect the sensitivity of the environment and the extent of change that would occur. The West Lewis coastline is characterised by an open Atlantic horizon and an undeveloped nature that evokes a strong sense of remoteness. The introduction of large-scale turbines in proximity to the

shoreline would establish a continuous industrial presence, drastically altering this character and resulting in a permanent transformation of the landscape.

The visual change anticipated from this application is not adequately represented. The turbines' scale and closeness would dominate views from residential areas, historic sites, and popular coastal locations, which would lead to a direct impact on visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment fails to properly convey the significance of this impact on such a sensitive landscape.

Concerns arise regarding the methods used to select and present visual viewpoints. Evidence suggests that the chosen viewpoints may not capture the perspectives of the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets in isolation, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, changing the context in which heritage assets are perceived and disrupting their connection to the natural horizon. This represents not merely a visual issue but broader cultural and spatial harm that has not been appropriately assessed within the application.

From a policy standpoint, the proposal contradicts the National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of the proposed changes does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further questions the claim of compliance with policy.

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

Collectively, these points illustrate that the assessment inadequately represents the true scale of impact, the sensitivity of the environment, and the interrelated 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 West Lewis coastline features clean coastal waters and important habitats that are vulnerable to disturbance and contamination. The proposal, which involves significant seabed preparation and installation activities in a high-energy Atlantic environment, lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted. This approach raises concerns, as it prevents a thorough assessment of these measures' adequacy and effectiveness.

The application acknowledges various risks, including sediment mobilisation and accidental chemical or oil spills, yet it does not offer sufficient detail on how these issues will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts, which could affect sensitive marine species and habitats already identified in the broader assessment.

The omission of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards exist to address pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures prior to granting consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, both of which are vital to the local community. However, the application in question does not adequately assess the ecological or socio-economic impacts associated with its proposals. It is evident that the assessment of fisheries and marine life is insufficient, failing to provide a robust evaluation that would allow for an understanding of how these essential uses and habitats can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any

consequences. The application lacks evidence to support the claim that alternative fishing grounds are available, accessible, or capable of bearing the additional pressures that displacement would create. This critical omission poses a risk of overfishing in other areas, which could have far-reaching economic consequences for the local fleet. Consequently, without a clear and evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and the livelihoods of those who depend on them.

Furthermore, the proposal raises considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is anticipated to cause disturbances over large distances, impacting species such as dolphins. The potential disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the significance of these effects, lacking sufficient supporting evidence to substantiate its claims.

In addition, there exists a glaring inconsistency within the application where the necessity for licences to permit harm to European Protected Species is acknowledged, even as the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the entire assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when there is an expectation of harm requiring legal authorisation.

The assessment further fails to consider the cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to 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 does not sufficiently show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that this proposal represents sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive “wall of light” effect across the western horizon. This significant change not only impacts visual amenity but also poses a severe risk to the area’s cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application

fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

In sum, 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 means that the application is incomplete and cannot support 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 Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary standards for sustainable development when evaluated against national policy, statutory duties, and evidential standards. It brings back the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the level of industrialisation. This current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

However, the application lacks a complete and trustworthy evidential basis for evaluation. There are significant gaps in baseline data, the design envelope is not clearly defined, and there is an over-reliance on unspecified mitigation measures. Furthermore, important impact pathways, such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications, have been excluded. Consequently, the Environmental Impact Assessment is not thorough enough to fully understand potential significant effects or remaining impacts.

Moreover, the process has clear procedural shortcomings. The failure to provide a

compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

The proposal is also at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural areas, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot prove a net economic benefit due to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects with reasonable scientific certainty has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause considerable and irreversible changes to a highly sensitive landscape. Industrialising the Atlantic-facing coastline, losing dark skies, disrupting cultural and visual connections, and negatively affecting tourism represent permanent impacts that cannot be adequately mitigated.

When considering all these factors, the application is procedurally and substantively unsuitable for determination. The significant gaps in information, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority should either refuse consent on these bases or employ the appropriate regulatory measures to obtain the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AFA417D0

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

Dear Sir/Madam

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

An adequate evidential basis for a lawful determination is notably absent. Critical environmental data has not been provided, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The application employs a flexible design framework, which hinders a clear understanding of potential significant effects. Furthermore, there is reliance on unspecified mitigation measures, which prevents assessment of their effectiveness. Consequently, the documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. 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. The application does not satisfactorily demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These issues directly affect the statutory tests required for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines placed near the shoreline, raises serious concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report associated with the proposal is fundamentally inadequate, lacking a comprehensive, transparent, and dependable

evaluation of its potential environmental effects. The employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This ambiguity hinders the consistent application of a worst-case scenario analysis, ultimately compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, obscuring the true extent of environmental consequences from both the public and the competent authority.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions, where environmental harm is purportedly to be addressed subsequently, obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases contravenes the procedural requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Moreover, there exist notable evidential shortcomings, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such inadequacies lead to uncertainties regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting data. The lack of comprehensive information precludes 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 stipulated under the Habitats Regulations necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be conclusively shown 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 clearly defined mitigation measures, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and result in the competent authority lacking the requisite information to appropriately determine the application.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured comparison of realistic alternatives based on their environmental effects. This approach fails to show that less harmful options have been properly identified,

assessed, and chosen over more damaging solutions. The assessment of alternatives is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline is sensitive, and the proximity to shore significantly affects impact determination. The absence of this analysis hinders any conclusion about whether the proposed siting is the least damaging option.

The deficiencies also include cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that mitigation by design has not been implemented, relying instead on post-design measures.

Due to these shortcomings, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from assessing whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment suffers from significant deficiencies, leading to an incomplete understanding of ecological receptors in this biologically active marine system. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of key species, which results in a lack of a solid evidential basis for evaluating potential impacts.

A major concern is the inadequate recognition and assessment of otters, a European Protected Species, particularly their active use of coastal areas for foraging and movement. The failure to account for their core foraging range and behaviour means that the implications of construction disturbance, noise, and increased activity have not been thoroughly examined. This raises doubts about the conclusions drawn regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks demonstrates further shortcomings, as it relies heavily on aerial surveys that are prone to detection bias under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations indicating a frequent use of these waters. The neglect to incorporate relevant data results in an inadequate baseline and undermines the reliability of the findings.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the genuine scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, further contributing to the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment submitted as part of the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is located within key foraging areas and migratory pathways. The implications of displacement, collision risk, or habitat loss are not robustly evaluated, raising concerns regarding the potential impact on these populations.

A critical contradiction within the application arises from the developer's conclusion of no significant adverse effects, juxtaposed with the advancement of a Habitats Regulations derogation case, which is necessitated only where significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. Furthermore, the assessment fails to convincingly address the impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the importance of these feeding grounds, and its

reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application lacks a sufficient assessment of the long-term implications of sustained mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. Consequently, this engages the precautionary principle, preventing a lawful conclusion that would support consent.

These deficiencies also signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable, hindering a comprehensive evaluation of impacts and leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application takes a reductive approach by treating heritage merely as a collection of isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

A critical shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial and spiritual sites; however, they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. The result is an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Additionally, the assessment fails to consider intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are entirely omitted from the assessment, representing a significant gap. Without addressing these factors, it is impossible to fully understand the cultural

impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised in Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Another procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community without this assessment, preventing a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to account for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not provide a sufficient foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment commissioned by the developer raises serious concerns regarding social impacts, health, and wellbeing. Although focus groups with local residents were conducted, the full report has not been made available. This absence represents a substantial evidential gap, preventing both the public and the competent authority from fully grasping the social risks identified by the developer's own research.

Summaries that have been released indicate 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 therefore grounded in reality rather than speculation. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which restricts the understanding of their significance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings noting instances of "cultural loss." Despite this recognition, these implications have not been adequately addressed in the main application or given the necessary consideration. The decision to withhold the full

Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning may be at stake. By failing to provide the full dataset, the application lacks a solid evidential foundation needed for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence at hand indicates that adverse effects are already present and not fully disclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The procedural ramifications of these issues are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. 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 and an undeveloped character that conveys a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The application significantly underrepresents the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not adequately convey the level of impact or its significance, particularly given the sensitivity of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impacts have been understated, which undermines the

credibility of the assessment.

Moreover, the assessment neglects to consider 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 that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The 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 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 significant onshore works, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These activities require excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. Unfortunately, the application fails to provide a thorough assessment of the impacts from these works, which inhibits a complete understanding of the overall environmental footprint of the project.

The assessment of onshore infrastructure remains materially incomplete, neglecting to consider the full extent of impacts that arise from what constitutes a single integrated project. The onshore and offshore elements are intrinsically linked, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all project components be considered together; however, the current separation means that the combined effects on peatlands, habitats, and local communities are not adequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are subject to protective policies. The application does not sufficiently demonstrate that impacts on these crucial habitats have been fully assessed or that appropriate measures to avoid such impacts have been implemented. This leads to a clear evidential gap regarding biodiversity protection.

Moreover, the proposal raises significant concerns about carbon balance. Disturbance of peatland may release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or provide assurance that the overall carbon balance remains positive.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is a lack of evidence in the application regarding the initiation of necessary consents or processes, which raises questions about the deliverability and lawful implementation of the proposal.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The proposal to introduce permanent red aviation lighting has the potential to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which contribute to its environmental quality, cultural identity, and tourism value.

Moreover, the application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing importance of dark skies to local identity and emerging tourism sectors, such as astro-tourism. The failure to adequately consider these factors creates a significant gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the impacts on nocturnal

wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not present any lighting impact assessment or phototaxis study, leading to an inability to assess how aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the ornithological assessment's reliance on daytime survey data fails to address nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. The lack of site-specific night-time data represents a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. This oversight further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral element of the overall ecological framework.

In summary, the lack of any assessment related to dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete, precluding it from supporting a lawful determination.

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 fundamentally fails to meet the requirements for sustainable development, as it does not satisfy statutory duties, national policy, or evidential standards. This application is strikingly similar to the rejected Lewis Wind Power proposal from 2008, where the level of industrialisation was deemed unacceptable. Despite being submitted under a framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application still falls short.

A significant concern is the lack of a complete and reliable evidential basis for evaluation. It contains critical gaps in baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose a full Social Impact Assessment is a material omission.

These shortcomings prevent an accurate assessment of impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage. It fails to show acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements remain inadequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

Moreover, 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, the disruption of cultural and visual relationships, and the detrimental impacts on tourism represent permanent effects that cannot be mitigated to an acceptable level.

Considering all these issues, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the necessary 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 refused in its entirety.

Additional Comments

Aside from the above and having these structures take over our homeland, we might expect to benefit from significantly reduced electric costs on our island..but we are of course not going to. Which makes it impossible to see the benefit to the residents. Quite the opposite.

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: 80818D10

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 accompanying documentation, highlighting material deficiencies across planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the proposal directly challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful determination. There are significant gaps in critical environmental data, with baseline information proving to be limited and inconsistent. Furthermore, key components of the proposal are not clearly defined. The reliance on a flexible design framework undermines a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot currently be evaluated. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts involved, with claims of negligible or non-significant effects lacking robust evidence.

Additionally, the proposal reveals clear and substantive conflicts with policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly due to the large turbines being positioned in close proximity to the shoreline. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and unfit for a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that raise concerns about its reliability and transparency regarding the environmental effects of the proposed development. A significant issue is the adoption of a flexible Project Design Envelope, which lacks specific details about turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty and hinders the ability to apply a worst-case scenario consistently. Consequently, the reported impacts may not accurately reflect the actual development, leaving both the public and the competent authority unable to fully comprehend the environmental implications.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are yet to be established. Seeking consent on the premise that environmental harm will be addressed in the future diminishes the opportunity for a meaningful evaluation of the effectiveness of these measures and the assessment of any residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and undermines the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly delineated before determination.

Additionally, there are significant gaps in the evidence presented, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainties surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainties that conflict with statutory requirements.

As a result, the application does not meet the evidential standards necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations pertaining to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make a well-informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The current application proposes a project that fails to meet the necessary standards required by the Environmental Impact Assessment regime, particularly concerning the assessment of alternatives. Instead of delivering a systematic and reasoned

comparison of viable alternatives based on their environmental effects, it offers a narrative that describes the evolution of the project. This narrative does not convincingly show that less damaging options have been properly identified and selected over more harmful solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not adequately explore the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of this analysis precludes any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence of a thorough exploration of alternative routes aimed at avoiding or minimising impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the absence of a comparative analysis suggest that mitigation through design has not been adequately considered, relying instead on measures that would be applied post-design.

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

From a policy viewpoint, these inadequacies undermine alignment with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary detail and reliability to understand ecological receptors in the West Lewis coastal environment, which is a biologically active and highly sensitive marine system. The baseline data provided is incomplete, and the methodologies used do not effectively capture the presence, behaviour, and habitat use of local species. Consequently, the assessment fails to establish a sound evidential basis for evaluating impacts.

A significant shortcoming is the inadequate recognition and assessment of otters, a European Protected Species, and their active use of coastal areas for foraging and

movement. The absence of an analysis of their core foraging range and behavioural patterns means that the potential effects of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This gap undermines conclusions regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys introduces a considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared 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 diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk faced by marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant methodological weaknesses and internal inconsistencies. It fails to provide adequate evidence that the internationally important seabird populations, which inhabit the west coast of the Isle of Lewis and are already in decline, will not be adversely affected. The turbines are situated within key foraging areas and migratory pathways, yet the application does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these species.

Moreover, there exists a fundamental contradiction in the application; the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious questions regarding the validity of the

assessment's conclusions, which are not substantiated by the supporting evidence.

The assessment does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents additional risks, as it effectively forms 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 impacts of sustained mortality within this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which obstructs a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies demonstrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to prove that internationally important seabird populations will remain unharmed places the proposal in direct conflict with national policy.

In conclusion, the assessment's internal inconsistencies, methodological flaws, and lack of supporting evidence culminate in an unreliable evaluation of impacts, reinforcing that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is significantly flawed, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape wherein environment, tradition, language, and community are interconnected. Rather than appreciating heritage for its evolving social, cultural, and spiritual significance within the community, the application adopts a simplistic view, perceiving it as a collection of unchanging, isolated assets.

An important shortcoming relates to the treatment of culturally significant sites, including the cemeteries at Bragar, Dalmore, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are erroneously classified as static features. This oversight neglects their ongoing usage and meaning, as well as the potential impact of development on their surroundings. Such misrepresentation leads

to an incomplete assessment of cultural consequences and overlooks their vital role in community life.

Additionally, the assessment inadequately addresses intangible aspects of cultural heritage, such as the Gaelic language and the longstanding connection between the coastal community and its environment. These elements are crucial to the area's identity but are notably absent from the evaluation, which constitutes a significant oversight. The cultural ramifications of the proposed development cannot be fully comprehended without these considerations.

There are also substantial concerns surrounding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity aligned with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of public participation in decisions that affect cultural and environmental matters.

A further procedural issue is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination unfeasible.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to recognise both tangible and intangible heritage, alongside a disregard for living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing in this application is significant and undermines the necessary evaluation process. While the developer has conducted a Social Impact Assessment that involved local residents through focus groups, the full report remains unpublished. This creates a serious evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries reveal that local residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct feedback from the community and are not mere

speculation. However, without access to the complete assessment, it is impossible to scrutinise these findings fully, which limits the capacity to evaluate their significance in the decision-making process.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these concerns have not been adequately included in the main application or afforded the necessary weight. The failure to disclose the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency further complicates the Environmental Impact Assessment process. Understanding the social, economic, and health implications is vital for projects of this magnitude, especially when considering potential effects on community character and functioning. The application's omission of the full dataset results in an insufficient evidential basis to weigh the benefits against the harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the evidence available suggests that adverse effects already exist and have not been fully disclosed. Without the complete assessment, it cannot be shown that the application complies with this policy.

The procedural consequences of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This gap represents a material omission in the application and fails to satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application fails to accurately depict the magnitude of the visual change. Given the size and closeness of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual

amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the credibility of the assessment.

Moreover, there is a failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and breaking their link to the natural horizon. This change represents not only a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is at odds with the need 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 policy compliance.

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

Overall, the assessment does not accurately convey 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 preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant 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 properly evaluate likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that are to be prepared after consent

is granted. This approach hinders any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment heightens the concerns associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and critical habitats that are particularly vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Additionally, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards will be established to respond effectively to pollution events. This situation introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of crucial environmental safeguards conflicts with the requirements set forth by the Environmental Impact Assessment regime. It is essential that likely significant effects and their mitigation are assessed prior to consent; without such information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

One critical concern is the flawed assumption that fishing activities can be relocated

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, leaving a significant evidential gap regarding the project's overall environmental footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment along the West Lewis coastline, an area renowned for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The absence of any assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors is a significant oversight, particularly as dark skies contribute to the area's identity and emerging sectors like astro-tourism.

Moreover, there is a critical lack of evaluation concerning the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and lead to increased collision risks. The application fails to provide any lighting impact assessment or phototaxis study, thus neglecting to address how the proposed aviation lighting may adversely affect these species or contribute to mortality rates.

This issue is further compounded by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are vulnerable to disorientation due to artificial lighting, yet this risk remains

unassessed. The absence of site-specific night-time data represents a critical gap in understanding ecological impacts.

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

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

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

TOURISM

The assessment of the potential impacts on tourism is significantly inadequate and neglects to examine the economic and social ramifications for a crucial sector of the economy on the Isle of Lewis. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, 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 constituting as much as 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the resultant decline in environmental quality would affect Tourism Gross Value Added or the overall resilience of the economy. In the absence of this analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in shaping the visitor experience and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial void in understanding the impacts on this recognised and expanding aspect of the local economy.

In a context where the island community has limited economic diversification, the failure to evaluate impacts on tourism 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 considered as mandated by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and considering the island's economic dependence create 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 application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the key issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the deficiencies in the current application remain significant.

A thorough review reveals a lack of a complete and reliable evidential basis for determination. There are notable deficiencies in baseline data, the application employs an undefined design envelope, and it relies on unspecified mitigation measures. Furthermore, there is an absence of critical impact pathways, particularly regarding nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full comprehension of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a material oversight. Such deficiencies hinder the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal is directly at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been adequately assessed, clouding the understanding of impacts on peatlands,

carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are present, and inconsistencies exist within these evaluations. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which invokes the precautionary principle and precludes a lawful conclusion that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of the informational deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or exercise the relevant regulatory provisions to obtain the missing information.

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

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: 80DA9A99

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to offer a full, transparent, or reliable overview of the likely environmental effects associated with the proposal. The flexible Project Design Envelope introduces uncertainty, as it does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty undermines the assessment's integrity, resulting in potential discrepancies between the impacts presented and the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the assumption that environmental harm will be managed later hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. A lack of sufficient information complicates a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with the National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination on the application.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured, evidence-based assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough comparison of realistic alternatives based on their environmental effects, it offers a narrative account of the project's evolution. This method does not sufficiently demonstrate that less

harmful options have been properly identified, assessed, and chosen over more damaging solutions.

The lack of transparency in evaluating alternative offshore locations, development scales, or design configurations is evident. The developer has not shown that they have meaningfully 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 critical role of proximity to shore in determining impact, the absence of such analysis hinders any conclusion that the proposed siting represents the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the application does not employ mitigation by design, instead relying on post-design measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly flawed. It does not deliver a complete understanding of the ecological receptors in the West Lewis coastal area. This marine environment is sensitive and biologically vibrant, yet the baseline data used is lacking. The methodologies employed do not effectively capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to provide a reliable basis for understanding potential impacts.

A significant oversight is found in the treatment of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the possible effects of disturbances from construction, noise, and increased activity have not been thoroughly evaluated. This lack of attention to otters undermines any claims about the absence of

significant impacts on this species.

The assessment of basking sharks also shows notable deficiencies. The reliance on aerial surveys creates considerable detection bias, particularly in Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate frequent usage of these waters. Neglecting to incorporate or adequately assess this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based more on assumptions than on sound evidence. The insufficient baseline data also obstructs a meaningful examination of cumulative and indirect effects, including variations by season and interactions within the broader ecosystem. This results in uncertainty regarding the true extent of risks posed to marine species and their habitats.

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

In summary, the combination of incomplete baseline data, inadequate methodologies, and unfounded conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of the impacts on marine ecology and protected species and result in the overall determination that the application does not have a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application 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 West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance 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. Despite their continued use and significance, the assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed

Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure. 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 oversight alone hinders a lawful determination.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application lacks a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application raises significant concerns regarding the assessment of social impacts, health, and wellbeing, which is markedly deficient and lacks the necessary transparency for a lawful evaluation. While the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This creates a considerable 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 own research.

Summaries available indicate that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These reported impacts stem from direct community engagement, which underscores their legitimacy. Nevertheless, the absence of the complete assessment curtails proper scrutiny of the findings and limits the determination of their significance within the decision-making process.

Furthermore, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these significant impacts have not been properly integrated into the main application or given the weight they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency seriously undermines the Environmental Impact Assessment

process, where a comprehensive understanding of social, economic, and health impacts is critical, especially for developments that could affect community character and functioning. The application fails to provide a complete evidential basis for assessing the balance between potential benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that remain inadequately disclosed. Consequently, it cannot be established that the application complies with this policy without the full assessment.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This initiative would result in a significant industrial presence that fundamentally alters the existing character of the landscape, leading to a permanent and irreversible transformation. The application fails to accurately represent the magnitude of the visual change, as the scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Consequently, this would adversely affect visual amenity, undermining the qualities of naturalness and remoteness that currently define the area.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, compromising the reliability of its findings. Furthermore, the interconnected relationship between landscape, seascape, and cultural heritage has not been properly assessed. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are linked to the wider landscape through visual and spatial relationships with the Atlantic horizon. 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 would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately considered in the application. From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a robust worst-case assessment further undermines any claims of compliance with policy requirements.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are therefore fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation strategies. Collectively, these deficiencies in the assessment prevent a reliable evaluation of the proposal's impacts, reinforcing the conclusion that it is incompatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment related to construction and pollution risks is notably inadequate, failing to deliver the necessary detail to evaluate the likely environmental effects. The project entails considerable seabed preparation and installation operations in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent, thereby hindering any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, managed, or monitored.

There exists uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the

ability to evaluate whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the absence of such information renders a lawful determination impossible. Additionally, the application does not prove compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application in question does not sufficiently evaluate the ecological or socio-economic impacts associated with these vital resources. It fails to convincingly demonstrate that existing habitats and fishing activities can be protected or maintained without facing significant disruption.

A critical flaw within the application is its assumption that fishing activities can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds are available or that they can handle the additional pressure resulting from such displacement. This lack of information is particularly concerning, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a detailed and evidence-based assessment inhibits a proper understanding of the potential impacts on both fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over vast areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application seems to downplay these effects without adequate supporting evidence.

There are also inconsistencies within the application itself, particularly regarding the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in scenarios where harm is predicted to a degree necessitating

legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A lack of thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be determined effectively.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not sufficiently prove that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. This results in an inability to conduct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed as it treats onshore and offshore components separately, failing to recognise that they are part of a single integrated undertaking. This fragmented approach obscures the true scale of environmental and socio-economic impacts that arise from the entire project.

The onshore aspects of the proposal involve significant work, such as laying cabling across protected moorland, constructing a substation near Stornoway, and creating access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is both a vital carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a complete understanding of the project's environmental footprint.

Moreover, by postponing or omitting the assessment of onshore impacts, the application fails to adequately evaluate cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project elements in conjunction, yet the disjointed evaluation of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities are not fully appreciated.

There are significant threats to sensitive habitats, such as machair systems and peatland environments, which hold protective policy designations. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that effective avoidance measures are in place. This raises an evidential gap in relation to the protection of biodiversity.

Concerns regarding carbon balance also emerge from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application fails to adequately confront this issue or prove that the overall carbon balance is favourable.

Furthermore, routing infrastructure through active croft land could cause conflicts with existing land uses and legal rights. There is no evidence presented that necessary consents or processes have been initiated, which raises serious concerns about the deliverability and lawful execution of the project.

From a policy standpoint, the lack of an integrated assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated diminishes the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate how this lighting may impact visual amenity, landscape character, and the experiences of both residents and visitors. This is especially pertinent given the importance of dark skies to the region's identity and the emerging tourism sector focused on astro-tourism. The lack of consideration for these impacts represents a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study in the application means that the potential effects on these species and the likelihood of increased mortality are not addressed.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of

disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a crucial gap in understanding ecological impacts.

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

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

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

TOURISM

The assessment of tourism impacts associated with the proposed development is significantly lacking, failing to adequately evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application falls short by failing to model the potential impacts of industrialising the seascape and the resultant loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Furthermore, the assessment neglects to consider the critical role of environmental quality in enhancing the tourism experience, particularly the value of unspoiled landscapes and dark skies to visitors, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to examine the

implications for tourism raises broader concerns regarding employment, local businesses, and community sustainability. The omission 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 adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposed development.

Collectively, the failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependency result in a notable evidential gap. This lack of comprehensive evaluation undermines the ability to draw robust conclusions about the economic effects of the proposal and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

The proposal also contradicts National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, particularly due to the lack of tourism impact analysis. The assessment of cumulative impacts from both offshore

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

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

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

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

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

Additional Comments

My family are from Lewis and I have spent years visiting the island and enjoying all it has to offer. I am appalled at this scheme particularly as I spend a lot of my time in Saltdean on the south coast where the Rampion wind farm has a huge impact and is not on the same scale as this proposal.

The Rampion farm is 13 km offshore and the turbines are much shorter than proposed here and blight the views offshore, never mind the unknown impact on the wildlife. Whilst that might be acceptable on the south coast, it has proved a disappointing focus where there was once an uninterrupted skyline. Off the coast of Lewis, a much more important area for wildlife and an increasing area for controlled tourism, this proposal seems outrageous. It seems too close to the island and unnecessary given the importance of nature to this part of the world. It seems particularly ridiculous that there is a campaign to ban guga hunting when this is being proposed which will impact the area so negatively. I urge everyone to reconsider this proposal.

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: D9FA3C4A

