

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment processes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental concerns, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic coastline, largely untouched environment, and strong cultural heritage. The size, location, and design of the project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a valid decision. It is missing critical environmental data, and the baseline information is both limited and inconsistent. Furthermore, important components of the proposal remain unspecified. The use of a flexible design framework hinders a clear assessment of potential significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or insignificant effects lack strong supporting evidence.

There are notable and serious policy contradictions. The proposal seems to conflict with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for protecting biodiversity, climate interests, and environmental integrity. These contradictions are critical to the statutory requirements for consent and weaken the competent authority's ability to determine that the development meets policy standards.

The scale of the proposal is unprecedented in this area, with large turbines positioned close to the shoreline, raising significant concerns about the capacity of the landscape, visual impact, and environmental effects. The combination of insufficient information, reliance on undefined mitigation strategies, evidential flaws, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful decision. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the proposed project. The employment of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and hinders the application of a worst-case scenario analysis. This deficiency compromises the assessment's integrity, resulting in a lack of clarity for both the public and the competent authority regarding the actual environmental impacts that may arise from the development.

Furthermore, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such circumstances implies that environmental harm will be rectified post-approval, thus obstructing any substantive evaluation of the efficacy of these measures or the assessment of residual impacts. This postponement of essential information to a later stage not only contravenes the procedural norms but also undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be adequately detailed before a decision is made.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information results in an unclear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects with reasonable scientific certainty. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been thoroughly assessed or that suitable safeguards are in place regarding biodiversity protection and environmental integrity.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and transparent assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It presents a narrative account of project evolution rather than a reasoned comparison of

realistic alternatives based on their environmental effects. This approach does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is no evidence-based comparison of alternative offshore locations, development scales, or design configurations. The developer has not convincingly considered siting turbines further offshore, where impacts on visual, ecological, and coastal elements would likely be lessened. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact make the absence of such analysis critical. This gap prevents any assertion that the proposed siting represents the least damaging option.

The shortcomings also extend to cable routing and landfall assessment, as the application does not provide sufficient evidence that alternative routes have been explored to mitigate impacts on sensitive receptors. Notably, this includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis points to a failure to apply mitigation by design, relying instead on post-design measures.

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

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, reinforcing the conclusion that the application has not undergone adequate evaluation to support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant lack of thoroughness in its assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of static assets rather than a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. By adopting a reductive approach, it overlooks the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are inaccurately classified as static features. This failure to consider their continued use and meaning leads to an incomplete understanding of the cultural implications and neglects their vital role in community

life.

Moreover, the assessment disregards intangible cultural heritage, which includes the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are central to the area's identity yet are entirely absent from the evaluation, marking a significant oversight. Without accounting for these factors, it becomes impossible to grasp the true cultural impact of the proposed development.

Concerns extend to community rights and engagement, especially considering that the Gaelic-speaking population embodies characteristics of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and fails to align with recognised principles of participatory decision-making that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement established under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, the identified deficiencies place the application in direct contradiction with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy standards.

Collectively, the failure to address living heritage, intangible cultural value, community rights, and statutory requirements culminates in a considerable evidential gap. The cultural consequences of the development have not been adequately assessed, and the application lacks a sufficient basis for a proper evaluation of the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted appears to be materially deficient and lacks the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This absence creates a considerable evidential gap, hindering both the public and the competent authority from grasping the full extent of the social risks revealed by the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore based on

observable realities rather than speculation. Nevertheless, the failure to disclose the full assessment limits the opportunity for proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

Moreover, there is an indication that the proposal poses a perceived threat to community identity and cohesion, with concerns about “cultural loss” documented in the developer’s own findings. Despite this, the full extent of these impacts has not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. By not providing the complete dataset, the application does not offer a comprehensive evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. The development should contribute to positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully disclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for the introduction of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The presence of these turbines would lead to a continuous industrial presence that fundamentally changes this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not adequately illustrate the extent of the anticipated visual change. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations. This would detract from visual amenity

and undermine the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in a landscape of such sensitivity.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that certain viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This suggests that the magnitude of the visual impact may be understated, casting doubt on the assessment's reliability.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This results in not only visual repercussions but also a more profound cultural and spatial degradation that has not been adequately addressed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed changes are at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant. Thus, the resultant change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, the assessment fails to represent the full extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore elements include cabling through protected moorland, a substation near Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is

crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

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

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

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

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

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

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

SUMMARY

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

A complete and reliable evidential basis for determination is lacking. There are significant gaps in baseline data, the use of an undefined design envelope persists, and

the mitigation measures proposed are not clearly specified. Additionally, critical impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Procedural failures are evident in the application as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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 show that health and wellbeing impacts are acceptable and cannot substantiate a net economic benefit, given the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to obtain the missing information.

A formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to 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: 87ED7B63

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References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and its accompanying documentation, several deficiencies have been identified that relate to planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. There are significant concerns regarding the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficiently evidential basis to facilitate a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined, which hinders a thorough understanding of the likely significant effects. The reliance on a flexible design framework and unspecified mitigation measures prevents the assessment of their effectiveness, leading to an incomplete picture of the potential environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust evidential support.

There are also significant policy conflicts evident within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in terms of biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they undermine the ability of the competent authority to ascertain that the development aligns with policy objectives.

The scale of the proposed wind farm is unprecedented for this area, with large turbines positioned in proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact. In summary, the lack of sufficient information, reliance on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance collectively indicate that the application is incomplete and fails to support a lawful determination. In light of these issues, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to deliver a complete, transparent, or trustworthy account of the probable environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without clear commitments to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will ultimately be constructed, which inhibits both the public and the competent authority from fully grasping the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed at a later stage hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation measures are clearly established before determination.

In addition, significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

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

When considered collectively, the dependence 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 hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured, evidence-based comparison of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of a reasoned analysis of viable alternatives based on their environmental impacts, it provides a

narrative that merely outlines the project's development. This raises serious concerns, as it does not convincingly show that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a noticeable absence of transparent analysis regarding alternative offshore locations, development scales, and design configurations. Specifically, it fails to indicate whether the developer has genuinely considered positioning turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be substantially lessened. Given the delicate nature of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of such evaluation precludes any assertion that the proposed siting is the least damaging option.

The inadequacies are also evident in the assessments related to cable routing and landfall, as there is insufficient evidence indicating that alternative routes have been thoroughly examined to avoid or lessen effects 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 effectively implemented, relying instead on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming raises significant issues regarding compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, which further supports the conclusion that the application has not undergone adequate evaluation and cannot be lawfully approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness, failing to deliver a reliable overview of the ecological receptors in the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, classified as a European Protected

Species. The application neglects to appropriately identify and assess their use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction-related disturbances, noise, and increased human activity have not been adequately analysed. As a result, this compromises any conclusions drawn about the absence of significant effects on this species.

In addition, the evaluation of basking sharks is hindered by reliance on aerial surveys, which can introduce substantial detection bias, particularly under challenging Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to integrate or properly consider such relevant data culminates in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological shortcomings outlined lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. Moreover, the lack of adequate baseline data obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an insufficient identification and assessment of protected species. This uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

When considered collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is deeply flawed, presenting significant gaps in evidence and inconsistencies that undermine its conclusions. It is critical to acknowledge that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate convincingly that these species will not suffer adverse effects. The development sits within essential foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A glaring contradiction arises within the application, where the developer asserts there

will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability, indicating that its conclusions lack the support of the necessary evidence. The assessment falls short of providing sufficient proof 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 thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, placing turbines within a recognised migratory corridor introduces a considerable risk, effectively establishing a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

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

The identified deficiencies also suggest 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The proposal adopts a narrow perspective by treating heritage as isolated and static, ignoring the ongoing social, cultural, and spiritual roles these elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active

places of burial and spiritual significance, yet are mischaracterised as static features. This oversight neglects their continued use and the implications of development on their context, leading to an incomplete cultural evaluation that dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, such as the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These components are central to the area's identity, and their omission signifies a critical gap in the evaluation process. Without considering these aspects, the potential cultural impact of the development remains inadequately understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to adhere to recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the application is deficient in not providing a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This absence means that the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, thereby precluding a lawful determination.

From a policy standpoint, these oversights position the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, clearly deviates from established policy standards.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and compliance with statutory obligations culminates in a significant evidential gap. The cultural impacts of this development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal's impact comprehensively. Without access to the complete dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

Moreover, there is a troubling lack of transparency regarding social impacts, health,

and wellbeing associated with the development. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, preventing both the public and the relevant authorities from grasping the full extent of social risks highlighted in the developer's research.

Available summaries reveal that residents are already experiencing notable stress, anxiety, and concern due to the size and proximity of the proposed development. These impacts are based on direct engagement, thereby affirming their validity rather than relying on speculation. Yet, the failure to release the comprehensive assessment stifles proper scrutiny of these findings and diminishes the capacity to assess their relevance in the decision-making process.

The perception of the proposal as a threat to community identity and cohesion is also evident, with "cultural loss" identified in the developer's own findings. However, these serious impacts have not been adequately considered in the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs tied to this development, thus failing to integrate these critical factors into the overall evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Effective development must foster positive health outcomes while minimising harm. Nevertheless, the existing adverse effects highlighted by the available evidence have not been fully acknowledged. Consequently, without the complete assessment, it cannot be substantiated that the application aligns with this policy.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the evidence of already experienced adverse impacts, renders the evaluation both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to support its approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of

naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of the impact, the sensitivity of the environment, and the interconnectedness of the landscape and heritage. These shortcomings inhibit a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are particularly vulnerable to sediment disturbance and contamination. The proposal involves significant seabed preparation and installation works in a high-energy Atlantic

environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate potential environmental effects.

The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures is troubling, especially given the sensitive nature of the receiving environment.

There are acknowledged risks such as sediment mobilisation and accidental chemical or oil spills, but the application fails to offer sufficient detail on how these risks 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 determine the extent, duration, or ecological effects of these potential impacts. This uncertainty also extends to the likely effects on marine species and habitats identified as sensitive in the broader assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application impedes the assessment of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the related mitigation must be evaluated prior to consent; without such information, a lawful determination cannot be achieved. 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 surrounding potential impacts make the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks and underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast support a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate how these important uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be relocated without negative consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can handle additional pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to underwater noise produced during construction activities. The high-energy hammer piling planned for an extended duration is expected to disturb marine life over large distances, notably affecting species like dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There is a clear contradiction in the application where it acknowledges the need for licences to harm European Protected Species while simultaneously describing those impacts as negligible. This inconsistency undermines the validity of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and fishing activity displacement. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore components involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of

access infrastructure through sensitive landscapes. These operations necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

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

There are also grave risks posed to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not adequately illustrate that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, leaving a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an assessment of dark skies and nocturnal wildlife, which is a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that is visible over long distances would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the importance of dark skies for the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts reveals a significant gap in the environmental and landscape assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a heightened risk of collision. The application does not present a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may impact these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal behaviours or associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting, yet this risk remains unassessed. The absence of specific night-time data critically limits the understanding of ecological impacts.

Without an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and hindering lawful decision-making.

From a policy standpoint, this omission contradicts National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape effects, as the character of night-time environments is an essential aspect of the overall setting.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies significant shortcomings in relation to sustainable development, as assessed against statutory requirements, national policy, and evidential standards. This application raises similar concerns to those that led to the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these expectations.

There are notable deficiencies in the evidential basis provided for the application. It lacks complete baseline data and continues to use an undefined design envelope, while also relying on unspecified mitigation measures. Furthermore, critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty looms over environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. These assessments display internal inconsistencies and do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, the competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

I think it's unfair for the island as we won't benefit from them being there as we would not gain any of the energy that is being produced. I also think it would have a big disruption on the marine life and the fishermen. It has huge risk to our ecosystem and pollution.

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: 32FF3299

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and its accompanying documentation, several deficiencies have been identified that relate to planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. There are significant concerns regarding the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficiently evidential basis to facilitate a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined, which hinders a thorough understanding of the likely significant effects. The reliance on a flexible design framework and unspecified mitigation measures prevents the assessment of their effectiveness, leading to an incomplete picture of the potential environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust evidential support.

There are also significant policy conflicts evident within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in terms of biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they undermine the ability of the competent authority to ascertain that the development aligns with policy objectives.

The scale of the proposed wind farm is unprecedented for this area, with large turbines positioned in proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact. In summary, the lack of sufficient information, reliance on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance collectively indicate that the application is incomplete and fails to support a lawful determination. In light of these issues, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to deliver a complete, transparent, or trustworthy account of the probable environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without clear commitments to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will ultimately be constructed, which inhibits both the public and the competent authority from fully grasping the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed at a later stage hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation measures are clearly established before determination.

In addition, significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

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

When considered collectively, the dependence 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 hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured, evidence-based comparison of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of a reasoned analysis of viable alternatives based on their environmental impacts, it provides a

narrative that merely outlines the project's development. This raises serious concerns, as it does not convincingly show that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a noticeable absence of transparent analysis regarding alternative offshore locations, development scales, and design configurations. Specifically, it fails to indicate whether the developer has genuinely considered positioning turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be substantially lessened. Given the delicate nature of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of such evaluation precludes any assertion that the proposed siting is the least damaging option.

The inadequacies are also evident in the assessments related to cable routing and landfall, as there is insufficient evidence indicating that alternative routes have been thoroughly examined to avoid or lessen effects 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 effectively implemented, relying instead on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming raises significant issues regarding compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, which further supports the conclusion that the application has not undergone adequate evaluation and cannot be lawfully approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness, failing to deliver a reliable overview of the ecological receptors in the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, classified as a European Protected

Species. The application neglects to appropriately identify and assess their use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction-related disturbances, noise, and increased human activity have not been adequately analysed. As a result, this compromises any conclusions drawn about the absence of significant effects on this species.

In addition, the evaluation of basking sharks is hindered by reliance on aerial surveys, which can introduce substantial detection bias, particularly under challenging Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to integrate or properly consider such relevant data culminates in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological shortcomings outlined lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. Moreover, the lack of adequate baseline data obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an insufficient identification and assessment of protected species. This uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

When considered collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is deeply flawed, presenting significant gaps in evidence and inconsistencies that undermine its conclusions. It is critical to acknowledge that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate convincingly that these species will not suffer adverse effects. The development sits within essential foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A glaring contradiction arises within the application, where the developer asserts there

will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability, indicating that its conclusions lack the support of the necessary evidence. The assessment falls short of providing sufficient proof 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 thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, placing turbines within a recognised migratory corridor introduces a considerable risk, effectively establishing a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

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

The identified deficiencies also suggest 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The proposal adopts a narrow perspective by treating heritage as isolated and static, ignoring the ongoing social, cultural, and spiritual roles these elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active

places of burial and spiritual significance, yet are mischaracterised as static features. This oversight neglects their continued use and the implications of development on their context, leading to an incomplete cultural evaluation that dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, such as the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These components are central to the area's identity, and their omission signifies a critical gap in the evaluation process. Without considering these aspects, the potential cultural impact of the development remains inadequately understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to adhere to recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the application is deficient in not providing a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This absence means that the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, thereby precluding a lawful determination.

From a policy standpoint, these oversights position the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, clearly deviates from established policy standards.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and compliance with statutory obligations culminates in a significant evidential gap. The cultural impacts of this development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal's impact comprehensively. Without access to the complete dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

Moreover, there is a troubling lack of transparency regarding social impacts, health,

and wellbeing associated with the development. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, preventing both the public and the relevant authorities from grasping the full extent of social risks highlighted in the developer's research.

Available summaries reveal that residents are already experiencing notable stress, anxiety, and concern due to the size and proximity of the proposed development. These impacts are based on direct engagement, thereby affirming their validity rather than relying on speculation. Yet, the failure to release the comprehensive assessment stifles proper scrutiny of these findings and diminishes the capacity to assess their relevance in the decision-making process.

The perception of the proposal as a threat to community identity and cohesion is also evident, with "cultural loss" identified in the developer's own findings. However, these serious impacts have not been adequately considered in the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs tied to this development, thus failing to integrate these critical factors into the overall evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Effective development must foster positive health outcomes while minimising harm. Nevertheless, the existing adverse effects highlighted by the available evidence have not been fully acknowledged. Consequently, without the complete assessment, it cannot be substantiated that the application aligns with this policy.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the evidence of already experienced adverse impacts, renders the evaluation both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to support its approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of

naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of the impact, the sensitivity of the environment, and the interconnectedness of the landscape and heritage. These shortcomings inhibit a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

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The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures is troubling, especially given the sensitive nature of the receiving environment.

There are acknowledged risks such as sediment mobilisation and accidental chemical or oil spills, but the application fails to offer sufficient detail on how these risks 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 determine the extent, duration, or ecological effects of these potential impacts. This uncertainty also extends to the likely effects on marine species and habitats identified as sensitive in the broader assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application impedes the assessment of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the related mitigation must be evaluated prior to consent; without such information, a lawful determination cannot be achieved. 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 surrounding potential impacts make the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks and underscore the conclusion that the application is incomplete.

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A major concern is the assumption that fishing activities can be relocated without negative consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can handle additional pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to underwater noise produced during construction activities. The high-energy hammer piling planned for an extended duration is expected to disturb marine life over large distances, notably affecting species like dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There is a clear contradiction in the application where it acknowledges the need for licences to harm European Protected Species while simultaneously describing those impacts as negligible. This inconsistency undermines the validity of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and fishing activity displacement. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore components involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of

access infrastructure through sensitive landscapes. These operations necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

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

There are also grave risks posed to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not adequately illustrate that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, leaving a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an assessment of dark skies and nocturnal wildlife, which is a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that is visible over long distances would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the importance of dark skies for the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts reveals a significant gap in the environmental and landscape assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a heightened risk of collision. The application does not present a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may impact these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not account for nocturnal behaviours or associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation caused by artificial lighting, yet this risk remains unassessed. The absence of specific night-time data critically limits the understanding of ecological impacts.

Without an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and hindering lawful decision-making.

From a policy standpoint, this omission contradicts National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape effects, as the character of night-time environments is an essential aspect of the overall setting.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies significant shortcomings in relation to sustainable development, as assessed against statutory requirements, national policy, and evidential standards. This application raises similar concerns to those that led to the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these expectations.

There are notable deficiencies in the evidential basis provided for the application. It lacks complete baseline data and continues to use an undefined design envelope, while also relying on unspecified mitigation measures. Furthermore, critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, which violates the statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment constitutes a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty looms over environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. These assessments display internal inconsistencies and do not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. Therefore, the competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

I think it's unfair for the island as we won't benefit from them being there as we would not gain any of the energy that is being produced. I also think it would have a big disruption on the marine life and the fishermen. It has huge risk to our ecosystem and pollution.

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: 32FF3299

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 deficiencies within the Environmental Impact Assessment Report are substantial, as it fails to furnish a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This lack of specificity compromises the integrity of the assessment and precludes both the public and the competent authority from grasping the actual extent of the environmental effects that may arise.

Furthermore, the application is heavily predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is being requested with the expectation that any environmental harm will be addressed subsequently, which undermines the ability to conduct a meaningful evaluation of effectiveness or to assess residual impacts. This postponement of vital information to post-consent phases is procedurally untenable and contravenes the objectives of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be unequivocally established prior to determination.

Evidential deficiencies also abound, encompassing gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. Such issues lead to uncertainty surrounding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In conclusion, the interdependence on an undefined design envelope, the absence of specified mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental impacts, placing the competent authority in a position where it cannot make an informed determination based on the information submitted.

ORNITHOLOGY AND SEABIRD IMPACTS

The application is situated within key foraging areas and migratory pathways crucial for internationally important seabird populations along the west coast of the Isle of Lewis,

many of which are in decline. However, the ornithological assessment fails to provide sufficient evidence demonstrating that these species will not be adversely affected. The evaluation does not adequately address the implications of displacement, collision risk, or habitat loss, which raises significant concerns.

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

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

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

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community intertwine. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage merely

as isolated and static assets. This approach neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

A significant shortcoming is the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight fails to acknowledge their continued use and meaning, and disregards how development impacts their settings, leading to an incomplete evaluation of cultural effects.

Furthermore, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have not been considered, resulting in a significant omission that impairs understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent, which diminishes the legitimacy of the assessment. This lack of meaningful engagement does not align with recognised principles for participation in decisions affecting cultural and environmental interests.

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

From a policy standpoint, these shortcomings conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, leaving the application insufficient for a proper evaluation of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall assessment of health, social impacts, and wellbeing presents significant deficiencies that undermine the transparency essential for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included engagement with local residents through focus groups. However, the full report remains unpublished, creating an evidential gap that hinders both public understanding and the

competent authority's ability to assess the identified social risks based on the developer's research.

Summaries that are currently available indicate that residents are experiencing notable stress, anxiety, and concern linked to the proposal's scale and proximity. These impacts arise from direct community engagement and should not be considered speculative. The absence of the complete assessment curtails scrutiny of the findings, restricting the ability to ascertain their importance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with references to "cultural loss" in the developer's own findings. Despite this, these impacts have not been adequately incorporated into the main application or given due consideration. The lack of access to the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when they may affect community character and functionality. Without providing the complete dataset, the application fails to establish a comprehensive evidential basis for weighing the benefits against the harms.

From the perspective of policy compliance, the application does not sufficiently demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, yet the available evidence indicates that existing adverse effects have not been fully addressed. In light of the absence of the complete assessment, the application cannot claim compliance with this policy.

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, marking a significant omission within the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, in conjunction with the evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised

by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual transformation. The size and nearness of the turbines will dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining characteristics of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a possibility that the scale of the visual impact has been downplayed, which undermines the assessment's reliability.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case analysis further weakens any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage.

These shortcomings preclude a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended duration is likely to disturb marine life across vast distances, notably affecting species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

Moreover, there is an evident inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while concurrently describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without an exhaustive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is markedly deficient in its evaluation of nocturnal wildlife and dark skies, which constitutes a significant omission. The coastline of West Lewis is noted for its exceptionally dark skies, integral to both

environmental quality and cultural identity, as well as being a draw for tourism. The proposal intends to install permanent red aviation lighting that would be observable over considerable distances, thereby creating a persistent and intrusive "wall of light" across the western horizon, fundamentally altering the nocturnal environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of local residents and visitors. Such an oversight is particularly significant in light of the role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. This lack of consideration introduces a clear deficiency in the comprehensive landscape and environmental evaluation.

More importantly, the proposal fails to include an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to their phototactic responses, which can cause disorientation and raise the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, resulting in an inadequate evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately address nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this potential hazard has not been examined. The absence of data specific to night-time conditions creates a crucial gap in the understanding of ecological impacts.

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

From a policy standpoint, these omissions contradict the guidelines set forth in the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Moreover, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecological framework.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analyses render the application incomplete and inadequate for a lawful decision-making process.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as outlined by statutory duties,

national policy, and evidential standards. This application echoes the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, despite being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal remains flawed.

The evidential basis for the application is neither complete nor reliable. Key baseline data is missing, the design envelope is not clearly defined, and unspecified mitigation measures are relied upon. Additionally, essential impact pathways have been overlooked, including those related to nocturnal wildlife, onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, the application presents serious shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately protect biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving the impacts on peatlands, carbon balance, habitats, and crofting land unclear.

Uncertainty surrounds potential environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal threatens to cause substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism create permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information gaps, coupled with policy contradictions and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or use appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

Just don't ruin our island

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 17D2500E

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. 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.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual impact, and environmental consequences. The application lacks a sufficient evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed results in an inability to fully understand the likely significant effects of the development. Furthermore, the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to lack of robust supporting evidence.

The proposal also exhibits clear and substantive conflicts with established policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not adequately demonstrate that it can meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

In light of these issues—insufficient information, undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy—the application is deemed incomplete and incapable of supporting a lawful determination. Therefore, the precautionary principle should be invoked in response to these concerns.

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.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it provides a narrative of project evolution. This approach does not adequately show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not demonstrate that the developer has seriously considered positioning turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such an analysis undermines the conclusion that the proposed siting is the least damaging option.

The deficiencies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been implemented, resulting in 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 represents a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives exist. Without a rigorous alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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 material omission that reinforces the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 assessment of cultural heritage and community identity is fundamentally flawed, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a narrow viewpoint, treating heritage as a collection of isolated and unchanging assets, failing to recognise their ongoing social, cultural, and spiritual significance within the community.

There are notable deficiencies in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites remain active places for burial and spiritual practices, yet the assessment categorises them merely as static features, neglecting their current use, significance, and the development's potential impact on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the

community and the coastal environment. These components are essential to the area's identity but are entirely missing from the assessment, marking a considerable oversight. Without these factors being accounted for, the true cultural impact of the development remains inadequately understood.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, characterised by a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to uphold established principles regarding participation in decisions that affect cultural and environmental matters.

A significant procedural gap is evident in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone hampers 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 places. The failure to engage with both tangible and intangible heritage, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

Overall, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to establish a sufficient foundation for evaluating the true cultural costs associated with the proposal.

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.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem as well as an active fishing industry. However, the assessment of fisheries and marine life within the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. There is a concerning assumption present in the application that fishing activity can simply be displaced without any repercussions. No evidence has been offered to suggest that alternative fishing grounds exist that would be accessible and capable of accommodating any additional pressure. This lack of information is critical, as such displacement poses risks of overfishing in other areas and can have wider economic ramifications for the local fishing fleet. Without a detailed and evidence-based assessment, the potential impacts on fisheries and the

livelihoods of those dependent on them remain poorly understood.

Furthermore, there are significant risks posed to marine species, particularly due to the underwater noise anticipated during construction. The use of high-energy hammer piling over an extended duration is likely to disturb marine life across large distances, affecting species including dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application seems to downplay these potential effects without providing adequate supporting evidence.

The application displays a notable inconsistency, acknowledging the need for licences to permit harm to European Protected Species while simultaneously categorising these impacts as negligible. Such contradictions undermine the credibility of the assessment and raise serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment neglects to take into account cumulative impacts that stem from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the proposal does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus precluding any conclusion regarding its status as sustainable development.

Overall, the shortcomings in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These inadequacies obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant infrastructure developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through sensitive landscapes. Notably, these onshore works involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. However, the application fails to offer a comprehensive assessment of these impacts, which is essential for understanding the project's overall environmental footprint.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that benefit from policy protection. The lack of a thorough assessment of impacts on these habitats raises concerns about biodiversity protection and demonstrates a clear evidential gap. Additionally, the disturbance of peatland

resulting from the project could lead to a release of stored carbon, potentially creating a carbon debt that contradicts the renewable energy objectives. The application does not adequately tackle this issue or show that the overall carbon balance will remain beneficial.

The assessment of onshore infrastructure is notably incomplete, and the separate evaluation of offshore turbines and onshore works leads to a fragmented approach, obscuring the true scale of environmental and socio-economic effects. By not assessing all project components together, the application prevents a proper evaluation of cumulative impacts, leaving the combined effects on peatlands, habitats, and local communities inadequately understood.

Furthermore, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence that the necessary consents or processes have been initiated, raising significant questions about the deliverability and lawful implementation of the project.

From a policy perspective, the failure to assess the project as a cohesive whole and to demonstrate protection for peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the credibility of the application. Taken together, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as

Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with the National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Furthermore, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these concerns.

There are significant deficiencies in the evidential basis provided for consideration. The application lacks comprehensive baseline data, employs an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it fails to include critical impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is insufficient, leaving uncertainties regarding likely significant effects and residual impacts.

Procedural inadequacies further undermine the application. The failure to produce a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

Additionally, the proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural spaces, and cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of net economic benefits due to insufficient tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and may be significantly detrimental. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and barring a lawful determination that impacts are acceptable.

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 of cultural and visual connections, and adverse impacts on tourism represent permanent changes that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively inadequate for determination. The multitude of information gaps, alongside policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I am a supporter of the environment and green energy in the right place. I object to the Spiorad na Mara offshore wind farm because of the potential damage to the environment, particularly the sea-life in the pristine waters along the west coast of the Isle of Lewis. As a scuba diver who has dived the waters along the west coast of the Isle of Lewis for many years I don't believe the impact statement gives an accurate impression of the pristine waters or the diversity of wildlife that they support. There are clear links between the health of the sea and the life within it and the health of our seabird populations. And these pristine waters, the sea-life within them, and the abundance of sea birds draw tourists to Uig; as do the dark skies of Aird Uig which are also under threat by this wind farm.

From conversations with a representative from the Scottish Government about the draft updated Sectoral Marine Plan for Offshore Wind energy, at a community engagement event at the Caladh Inn in Stornoway on the 10th July 2025, it appears that the survey of the sea was a desk based survey and the results based on what sea life would normally live in the sea conditions found within the area. I have been a diver for 24 years with the majority of my diving on the west coast of Scotland and its Islands, with the majority of my diving for the past 15 years being off of the west coast of Uig, the last 10 years focusing on providing data for Seasearch. The waters here are pristine but also unique in their marine life both in terms of quantity and diversity. We have recently found a

number of creatures which have unique adaptations which have not been found anywhere else. It is therefore not sufficient to do a desk based analysis of what sea life might be in our waters.

The area of Uig relies heavily on the money that tourists bring in. As a remote community 33 miles from the nearest town of Stornoway, and with the majority of job relying either directly or indirectly on tourism, this wind farm could have a huge negative impact on local economy. Tourists come for the views, the pristine shore line, sandy beaches, for walking in the Uig hills or sea life tours on Loch Roag; and they come for the dark skies and the hope of seeing an Aurora or just experiencing the dark skies on a clear night. All of this will be spoiled by the proposed wind farm with the knock on effect of hitting hard in the pockets of locals if tourist numbers decline. Note: Gallen Head Trust have been working on getting Dark Skies accreditation for a number of years this will most likely fail if the wind farm goes ahead.

I support smaller local green energy projects where the environment is protected and where the profit goes to the local community. I am the Chair of the Bhaltois Trust in Uig and we have a wind turbine. This is situated in a location which is inconspicuous and has minimal impact on both wildlife and the tourist industry. It provides income for the community led organisation which is used for the benefit of the community. Local community led organisations are currently unable to install new wind turbines due to SSE reserving capacity of the offshore wind turbines. This goes against my belief that the power should be produced close to the location where it will be used and that local communities should benefit from the ability to produce green energy.

I am also a member of Uig Community Council and we requested information from Councillors regarding the infrastructure which is in place or planned to support the wind farms. This information is not available and I believe (as did all of the Community Council representative present at the meeting) that a moratorium on the building of all large wind farm projects should be imposed until a full plan is available to communities; reassuring them that turbines will not be build and left idle while foreign companies are paid for them to be stopped, or that large amounts electricity will be lost due to poor electricity distribution infrastructure.

In addition to all of the above the Environmental Impact Assesment Report has omitted to accurately represent the views of the community. Huge numbers attended the consultation events with the vast majority of local residents objecting to this project. This has not been reported in the report.

In conclusion I object to the Spiorad na Mara wind turbines based on the massive environmental impact and local objection to this project which I believe has not been adequately represented in the Environmental Survey.

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: FC929CA0

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and proximity of the proposed turbines raise significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly given the unprecedented nature of this development in the area.

The application lacks sufficient evidential support for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, reliance on unspecified mitigation measures means their effectiveness cannot be evaluated, resulting in documentation that does not provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects are not substantiated by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to show compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the proposal's acceptability in policy terms.

Taken together, the absence of adequate information, the reliance on undefined mitigation measures, and the evident policy non-compliance highlight that the application is incomplete. In these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness, transparency, and reliability regarding the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hinders the consistent application of a worst-case

scenario and undermines the integrity of the assessment, leading to impacts presented that may not accurately represent the actual development. Consequently, this prevents both the public and the competent authority from understanding the true extent of the environmental effects.

Moreover, the application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As a result, consent is sought with the expectation that any environmental harm will be rectified subsequently. This approach hampers any meaningful evaluation of the effectiveness of proposed measures or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly identified before determination.

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot satisfy statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects 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 within the West Lewis coastal environment is fundamentally flawed. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of marine species. Consequently, the evaluation lacks a reliable evidential basis for assessing potential impacts.

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

Moreover, the assessment of basking sharks is similarly deficient. The reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The neglect of such critical data further weakens the completeness of the baseline and affects the reliability of the conclusions drawn.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the ornithological assessment related to the development application is materially flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The application fails to adequately demonstrate that these species will not be adversely affected, despite being located within key foraging areas and migratory pathways. It does not robustly evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application itself; the developer asserts that there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species that are

in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the siting of turbines within a recognised migratory corridor presents an additional and significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately address 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 required 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 in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in support 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. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

Overall, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such failings prevent a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity in the application is fundamentally flawed, overlooking the West Lewis coastline as a dynamic cultural landscape intertwined with environment, language, tradition, and community. It adopts a narrow view of heritage, treating it as disconnected, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

Significantly, culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are classified merely as static features despite being active burial grounds and sites of spiritual practice. This oversight neglects their ongoing use and significance, leading to an inadequate evaluation of cultural impacts and disregarding their essential role in community life.

Moreover, the application fails to address intangible cultural heritage elements, such as the Gaelic language and the community's deep-rooted connection to the coastal environment. These critical aspects are absent from the assessment and represent a considerable omission. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and contravenes established principles of participation concerning cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a significant procedural failure, contravening statutory requirements under the Islands (Scotland) Act 2018. This gap precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices represent a departure from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, resulting in an application that fails to establish a sufficient basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer represents a significant evidential gap in the planning application. This gap hinders the public and competent authorities from understanding the full extent of social risks identified through the developer's own research. Summaries suggest that local residents are already experiencing measurable levels of stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are therefore factual rather than speculative. However, without access to the complete assessment, there is insufficient scrutiny of the findings, which limits the determination of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Despite the recognition of these impacts, they have not been fully integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, which is crucial information for stakeholders.

The absence of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is essential for developments of this nature, particularly when community character and

functioning are at stake. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis required to assess the balance between the proposed benefits and potential harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and to avoid causing harm, yet the available evidence highlights existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to verify adherence to this policy.

The procedural ramifications of this non-disclosure are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material shortcoming in the application and represents a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the lack of disclosure regarding the full Social Impact Assessment, coupled with documented evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application does not possess sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and irreversible changes to the landscape.

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This introduces the risk that the visual impact has been understated, casting doubt on the assessment's reliability.

Another critical shortcoming is the lack of evaluation regarding the interconnected relationships between landscape, seascape, and cultural heritage. Sites like the

Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected by visual and spatial relationships to the Atlantic horizon. The assessment isolates these heritage assets, ignoring their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their bond with the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that the application fails to adequately assess.

From a policy perspective, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural places 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 robust worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is alarmingly incomplete and lacks the detail necessary for a thorough evaluation of likely environmental effects. This project entails significant seabed preparation and installation works within a challenging high-energy Atlantic environment. However, it notably does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be prepared only after consent is granted, which hinders any meaningful assessment of their adequacy or effectiveness.

Particularly troubling is the reliance on undefined future measures, especially considering the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and potential contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide the necessary detail on how these risks will be prevented, controlled, or monitored.

There remains considerable uncertainty about 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 becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential consequences for marine species and habitats that have been identified as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination is unattainable. Furthermore, the application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts renders the assessment materially deficient. These shortcomings significantly obstruct a rigorous evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented within the application lacks the necessary depth to evaluate the impacts on fisheries and marine life adequately. The waters off the West Lewis coast not only sustain a diverse marine ecosystem but also support an active fishing industry. However, the application fails to demonstrate that these habitats and uses can be preserved without substantial disruption.

A significant concern lies in the assumption made regarding the displacement of fishing activities. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can accommodate increased fishing pressure. This gap is critical, as the potential for overfishing in other areas poses risks to the local fishing fleet's economic stability. Without a rigorous evidence-based assessment, the consequences for fisheries and local livelihoods remain poorly understood.

The proposal introduces considerable risks to marine species, particularly due to underwater noise generated by construction activities. The use of high-energy hammer piling over an extended duration is expected to cause disturbances across vast areas, impacting species such as dolphins. Notably, the projected disturbance to a significant portion of the local bottlenose dolphin population raises alarm; however, the application diminishes the seriousness of these effects without adequate supporting

evidence.

An inconsistency is evident in the application's acknowledgement of the need for licences to permit harm to European Protected Species, while simultaneously characterising impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disruption, noise, and the displacement of fishing activities. The absence of a comprehensive analysis of these combined effects hampers the ability to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate its compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's sustainability.

In summary, the deficiencies in evidence relating to fishing displacement, the underestimation of acoustic impacts, and 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 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 proposal includes the introduction of permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks any evaluation of the impacts of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This deficiency is particularly concerning given the significance of dark skies to the identity of the region and to emerging tourism sectors like astro-tourism. The failure to address these impacts indicates a clear gap in the overall assessment of both landscape and environmental conditions.

Moreover, the assessment does not consider the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can lead to disorientation and a heightened risk of collision. The application is lacking a lighting impact assessment or a phototaxis study, thus failing to evaluate how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment is problematic, as it fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data results in a critical gap in the understanding of ecological impacts.

Without an assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. This also diminishes the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

SUMMARY

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

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

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a complete Social Impact Assessment constitutes a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby

rendering the application unfit for determination.

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E5E2C3FD

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 review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. This development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, alongside its 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 basis for a lawful determination, as critical environmental data is missing and baseline information is both limited and inconsistent. Key components of the proposal remain undefined, while the adoption of a flexible design framework obscures an understanding of likely significant effects. Furthermore, reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, with claims of negligible or non-significant effects lacking robust supporting evidence.

There are evident and substantive conflicts with policy. The proposal 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. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal features large turbines positioned dangerously close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is fundamentally incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a complete, transparent, or dependable account of the expected environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty impedes the application of a worst-case scenario assessment, thus compromising the integrity of the evaluation. Consequently, the impacts illustrated may not correspond to the development that is ultimately realised, hindering both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application significantly relies on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach requests consent under the premise that environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of effectiveness or understanding of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigation be clearly identified before a determination is made.

There are critical evidential shortcomings, including deficiencies in baseline data, constraints in methodology, and dependence on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are posited without robust supporting evidence. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The absence of a comprehensive and structured assessment of alternatives significantly undermines the application's compliance with the statutory requirements set out by the Environmental Impact Assessment regime. Instead of offering a reasoned and transparent evaluation of viable alternatives based on their environmental

implications, the application merely recounts the evolution of the project. This narrative approach fails to prove that less harmful options have been thoroughly identified and evaluated in preference to those with greater potential for damage.

Moreover, there is no evidence-based or transparent comparison regarding alternative offshore locations, development scales, or design configurations. The developer has not convincingly explored the possibility of siting turbines further offshore, where the potential for visual, ecological, and coastal impacts may be mitigated. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impacts make the lack of such analysis particularly concerning. This shortcoming prevents any reasonable conclusion regarding whether the proposed location represents the least damaging option available.

The shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence demonstrating that alternative routes have been properly considered to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation measures have not been integrated into the design phase, relying instead on post-design mitigation approaches.

Consequently, the application does not establish that environmental harm has been minimised through site selection, layout, and infrastructure routing. This oversight signifies a breach of the established mitigation hierarchy, thus preventing the competent authority from assessing whether more appropriate and less harmful alternatives could be available. In the absence of a robust assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policy frameworks.

From a policy standpoint, this inadequacy raises serious concerns regarding compliance with National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission that leads to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation concerning marine ecology and protected species is significantly inadequate, failing to deliver a thorough and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This region represents a highly sensitive and biologically rich marine system; however, the existing baseline data remains incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for assessing potential impacts.

A critical gap exists in the consideration of otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The neglect to consider their core foraging ranges and behavioural patterns means that the potential impacts stemming from construction disturbances, noise, and increased activity have not been sufficiently assessed. This deficiency undermines any assertions regarding the lack of significant effects on this species.

Further shortcomings are noted in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to incorporate or adequately assess such data results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The methodological weaknesses highlighted mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than strong evidence. The lack of adequate baseline data further obstructs the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk faced by 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 has not properly identified or assessed protected species. The uncertainty created by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. Under these circumstances, the granting of consent cannot be executed lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the implications of displacement, collision risk, or habitat loss.

There is a notable contradiction within the application itself, as the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions are not backed by the available evidence. The assessment lacks adequate evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively acting as a barrier in a key flight path for species travelling between the United Kingdom and Iceland. The application does not provide a thorough assessment of the long-term consequences of sustained mortality in this corridor, nor does it evaluate the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for

burial and spiritual practices; however, they are characterised merely as static features in the assessment. This oversight fails to acknowledge their ongoing significance and the implications of development on their surroundings, leading to an incomplete analysis of cultural effects and disregarding their importance in the fabric of community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and local traditions, along with the enduring connection between the community and the coastal environment. These aspects are vital to the region's identity but are entirely omitted from the analysis, representing a substantial gap. The absence of these considerations means that the cultural implications of the development cannot be fully comprehended.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, leading to a significant evidential gap that obstructs both public understanding and the competent authority's evaluation of the social risks identified by the developer's own research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. Nonetheless,

the lack of full disclosure limits proper scrutiny of the findings and hinders the assessment of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” highlighted within the developer’s findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning are at stake. By withholding the full dataset, the application does not provide a complete evidential basis to weigh the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments should support positive health outcomes and avoid harm; however, the evidence available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

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

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application inadequately represents the magnitude of the visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The level of impact and its significance in the context of such a sensitive landscape have not been

properly conveyed.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact is understated, thereby undermining the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated entities neglects their interdependence and results in an incomplete assessment of impacts on their setting and cultural significance.

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

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

The identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, rather than capable of reduction to an acceptable level through mitigation.

In conclusion, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in this application is fundamentally incomplete, lacking the necessary detail to properly evaluate the potential environmental effects. Given the proposed substantial seabed preparation and installation works within a high-energy Atlantic environment, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on vague mitigation and contingency measures that are to be formulated post-consent, which severely hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological 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.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application prevents a thorough evaluation of whether appropriate safeguards are established to address pollution events. This creates procedural risks and undermines the capability of the competent authority to effectively 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. It is critical that likely significant effects and associated mitigation measures be assessed prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life associated with this application presents notable deficiencies that fail to provide a comprehensive understanding of ecological and socio-economic impacts. The waters off the West Lewis coast are known to support a diverse marine ecosystem alongside a thriving fishing industry; however, the proposal lacks adequate evidence to demonstrate that these uses and habitats can be preserved or maintained without significant disruption.

A fundamental concern is the presumption that fishing activities can be displaced without adverse consequences. The application does not substantiate claims that alternative fishing grounds are readily available, accessible, or capable of

accommodating additional fishing pressure. This critical gap in the assessment is particularly significant, as displacement could lead to overfishing in alternative areas, thereby imposing broader economic ramifications on the local fishing fleet. Consequently, without a clear, evidence-based analysis, the implications for fisheries and livelihoods remain inadequately understood.

Moreover, the proposal introduces considerable risks to marine species, predominantly due to underwater noise produced during construction activities. The anticipated high-energy hammer piling over a prolonged duration poses the risk of widespread disturbance, potentially impacting species such as dolphins. The projected disruption to a substantial segment of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the gravity of these effects without sufficient corroborating evidence.

Furthermore, there exists a notable inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged. Simultaneously, the application characterises these impacts as negligible. This contradiction undermines the assessment's credibility and raises significant questions regarding compliance with the Habitats Regulations, particularly in cases where anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activity. In the absence of a thorough evaluation of these combined effects, it remains impossible to determine the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the proposal's alignment with sustainable development principles.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a rigorous evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely linked but assessed separately, leading to a fragmented evaluation that masks the true extent of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected

moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities require excavation through areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the disconnection between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal presents substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising serious doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The introduction of permanent red aviation lighting, which would be visible over extensive distances, creates an intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment of the West Lewis

coastline, an area renowned for its exceptionally dark skies, which are vital to its environmental quality, cultural identity, and tourism value.

Notably, the application neglects to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning in light of the growing importance of dark skies to the area's identity and sectors such as astro-tourism. The lack of consideration for these impacts highlights a significant gap in the overall landscape and environmental assessment.

Moreover, there is a critical failure to assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can disorient them and heighten collision risks. The application omits any lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not capture nocturnal activity or the associated risks. For instance, Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting. The absence of site-specific night-time data creates a critical gap in understanding the 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 necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

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

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a major deficiency. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application does not adequately assess the impacts on tourism, which is a crucial part of the Isle of Lewis economy. Tourism is significantly reliant on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, there is no 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, while also supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this growth, the application lacks modelling on how the potential industrialisation of the seascape and loss of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without such essential analysis, it remains unclear if the development would provide a net economic benefit or harm a vital and expanding sector.

Moreover, the importance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies, is overlooked. The failure to include a Dark Skies Assessment exacerbates this issue and creates a significant gap in understanding the potential impacts on a recognised and growing segment of the local economy, such as nature-based tourism and astro-tourism.

Given the limited economic diversification in the island community, not evaluating the impacts on tourism has broader consequences for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly examined, as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and supports the assertion 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 as dictated by statutory responsibilities, national policy, and evidential standards. It mirrors the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This application is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for determining the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the application continues to rely on an undefined design envelope. The proposed mitigation measures remain unspecified, and critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have not been adequately addressed.

Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or residual impacts.

Furthermore, there are notable procedural inadequacies. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the omission of a full Social Impact Assessment is a material shortfall. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural areas, and cultural heritage; it fails to prove that health and wellbeing impacts are acceptable; and it cannot establish a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been thoroughly assessed, which obscures their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and inhibiting a lawful determination that impacts are acceptable.

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

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

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

Additional Comments

I do not want this ruining our island and affecting wildlife and scenery

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: 5D63A745

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. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects based on an evaluation of the Environmental Impact Assessment Report and accompanying documents. Located off the west side of the Isle of Lewis, the area is noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The development's scale, design, and proximity to the shoreline raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a robust evidential foundation for a lawful decision. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and several crucial elements of the proposal remain undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, while the unspecified nature of proposed mitigation measures limits any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making unsupported claims of negligible or non-significant effects.

There are significant policy discrepancies, as the proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in terms of biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines planned in close proximity to the shore, raising considerable concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of sufficient information, the dependence on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it is clear that the application is incomplete and does not support a lawful determination. In this context, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally insufficient and does not reflect the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a persistent and prominent industrial presence, dramatically altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to convey the extent of this visual change adequately. The size and proximity of the turbines would overshadow views from residential areas, historical sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate this impact or its importance in the context of such a delicate landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints might not fully capture the most sensitive receptors or worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been downplayed, compromising the assessment's reliability.

Another critical shortcoming is the lack of consideration of the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment approaches these as isolated entities without recognising their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with the National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change is not compatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and closeness of the turbines, their presence would be predominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be mitigated to an acceptable degree.

In summary, the assessment does not accurately represent the scale of impact, the

sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, which is crucial given the diverse marine ecosystem and active fishing industry off the West Lewis coast. There is a failure to demonstrate that these important habitats and uses can be preserved without substantial disruption. A key concern arises from the unfounded assumption that fishing activities can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This significant omission raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. Without a clear, evidence-based evaluation, the implications for both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is expected to disturb a wide area, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a level that requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts arising from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders the ability to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to show that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the project represents sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the

assessment incomplete and unreliable. Such shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

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 is fundamentally flawed in its failure to meet the requirements of sustainable development, which is evident when assessed against statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This new application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a reliable evidential basis for determination.

Critical gaps in baseline data are evident throughout the application. It relies on an undefined design envelope, incorporates unspecified mitigation measures, and omits key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are procedural failings that further undermine the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a significant omission. These deficiencies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, or cultural heritage. The application fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and could be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The vast information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision-making process.

Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information. A formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

It saddens me to hear another wind farm being pushed through without proper considerations for the natural landscape and the impact on animals, on land and in the sea...

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: CD15B1BD

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment presents significant shortcomings, failing to deliver a complete or dependable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the existing baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is significantly flawed, exhibiting notable gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already declining. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected. Key foraging

areas and migratory pathways are situated in the development's location, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

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

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

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and prevents a lawful conclusion that could support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

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

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer has created a significant evidential gap. Without access to this crucial report, both the public and the competent authority cannot fully grasp the social risks identified through the developer's own engagement with local residents. Available summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These effects are based on direct feedback rather than speculation; however, the lack of transparency regarding the full

assessment inhibits proper scrutiny of the findings and limits the evaluation of their importance in the decision-making process.

Furthermore, the proposal is seen as a potential threat to community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Unfortunately, these impacts have not been sufficiently acknowledged or integrated into the primary application. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health consequences is vital for developments of this magnitude, especially when the character and functioning of the community may be at stake. By not providing the complete dataset, the application fails to offer a comprehensive evidential basis needed to weigh benefits against harm adequately.

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. Yet, the evidence available points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this policy cannot be proven.

The implications of this procedural omission 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, representing a material shortfall within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with clear evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hinders lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that embodies a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally altering the landscape and causing a permanent transformation. The assessment of seascape, landscape, and visual impacts is deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately represent the extent of the visual change. Given the scale and proximity of the turbines, 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. The significance of this impact has not been properly conveyed, particularly considering the

sensitivity of the landscape.

Moreover, there are methodological concerns regarding the chosen visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the magnitude of visual impact is understated, which undermines the reliability of the assessment.

A further shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these 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 assessed.

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 incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the completeness of its assessment related to construction and pollution risks, which lacks the necessary detail to evaluate potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application indicates that mitigation and contingency measures will be formulated after consent, which obstructs any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly when considering 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 does acknowledge risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, uncertainty persists regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies hampers the ability to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The shortcomings in the application are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application inhibits the evaluation of whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the obligations set out in the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not sufficiently demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impact on fisheries and marine life lacks thoroughness and fails to provide a credible analysis of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a significant fishing industry, yet the application does not adequately ensure that these vital resources and habitats will remain protected from significant disruption.

A critical concern is the assumption that fishing activities can be relocated without negative repercussions. There is no evidence presented that alternative fishing grounds exist, are accessible, or can sustain additional demands. This lack of information is crucial, as such displacement may lead to overfishing in other areas, adversely affecting the local fishing fleet's economic viability. Without a definitive and evidence-

based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances over large areas, impacting species such as dolphins. The anticipated disruption to a notable proportion of the local bottlenose dolphin population raises significant concerns, yet the application inadequately addresses the severity of these effects, lacking sufficient evidence to support its claims.

The application presents an inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction casts doubt on the validity of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering the conclusion 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 application result in an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises concerns about the routing of infrastructure through active croft land, which could lead to conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising doubts about its deliverability and lawful implementation.

There are significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection. The application does not adequately demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, resulting in a clear evidential gap in relation to biodiversity protection.

The assessment of onshore infrastructure is materially incomplete, failing to consider the full extent of impacts arising from a single integrated project. Onshore works, such as cabling across protected moorland and the construction of a substation near Stornoway, are intrinsically linked to the offshore turbines, yet they are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Moreover, the proposal raises concerns regarding carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts renewable energy development objectives. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, fundamentally altering the night-time environment along the West Lewis coastline. This lighting creates a continuous and intrusive “wall of light” effect across the western horizon. Such alterations pose significant threats to the area's identity, which is characterised by exceptionally dark skies that contribute to environmental quality and tourism value.

A critical omission within the Environmental Impact Assessment is the failure to evaluate the effects of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This gap is significant due to the rising importance of dark skies for the area's cultural identity and for emerging tourism sectors like astro-tourism. Furthermore, the absence of any lighting impact assessment or phototaxis study fails to address how this aviation lighting might affect nocturnal wildlife, particularly sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are prone to disorientation and increased collision risk due to artificial lighting.

Additionally, the reliance on daytime survey data in the ornithological assessment

neglects to capture nocturnal activity and its associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt remains unfulfilled, invoking the precautionary principle and rendering a lawful determination impossible.

From a policy standpoint, these omissions contradict National Planning Framework 4 concerning the protection of natural places and environmental quality. They also compromise the broader assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

In summary, the complete 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 renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The Isle of Lewis has seen significant growth in its tourism sector, with the economic contribution increasing from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application under consideration lacks a thorough assessment of tourism impacts, failing to evaluate both the economic and social consequences for this crucial sector. While it is acknowledged that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

The assessment neglects the essential role of environmental quality in sustaining tourism, particularly regarding unspoiled landscapes and dark skies, which significantly enhance the visitor experience. The omission of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a substantial gap in understanding the implications for an increasingly important segment of the local economy, such as nature-based tourism and astro-tourism.

In a community that relies heavily on a limited economic base, the failure to evaluate the impacts on tourism has broader repercussions for employment, local businesses, and the sustainability of the community. Furthermore, there is an absence of a compliant Island Communities Impact Assessment, which means the economic vulnerabilities under the Islands (Scotland) Act 2018 have not been properly assessed.

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

Overall, the combination of failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This situation hampers a comprehensive evaluation of the economic effects and suggests that the application remains incomplete.

SUMMARY

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

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

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

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough

investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

Owning a business on this island which is wholly dependent on tourism it is with great dismay to see the potential of one of the most stunning coastal areas in the world be destroyed in the name of profit.

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: 22122099

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, 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 rich cultural identity. The unprecedented scale, proximity to the shoreline, and design of this proposal raise significant concerns about its adherence to statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and associated documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, with missing critical environmental data and limited, inconsistent baseline information. Key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation unable to provide a comprehensive understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not substantiated by robust evidence.

The application is fraught with substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

Moreover, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy further illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, or reliable account of the potential environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This

approach undermines the integrity of the assessment and means that the impacts reported may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are hindered in understanding the true extent of environmental effects.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed at a later stage inhibits any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly established prior to determination.

Significant evidential deficiencies are also apparent, which include gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are presented without solid supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

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

Overall, the reliance on an unspecified design envelope, the absence of detailed mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and robust assessment of environmental effects and leave the competent authority without the necessary information to make a determination on the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and fails to present a complete understanding of the ecological receptors present in this sensitive and biologically active marine system. The methodologies utilised are inadequate for capturing the presence, behaviour, and habitat use of various species, resulting in a lack of reliable baseline data. Consequently, the basis for evaluating potential impacts is unsound.

Particularly concerning is the inadequate consideration of otters, which are classified as a European Protected Species. The application does not appropriately acknowledge

their active use of coastal areas for foraging and movement. Without an assessment of their core foraging range and behavioural patterns, the potential effects from construction disturbances, noise, and increased activity remain insufficiently evaluated. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is compromised due to reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic weather conditions. This method is likely to lead to an underestimation of the sharks' presence, especially when compared to well-established land-based observations that indicate these waters are frequently used by the species. The failure to properly incorporate such 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 robust evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions, which creates uncertainty about the actual risks facing marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not correctly identified or assessed protected species. The level of uncertainty present prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. In light of these issues, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an unreliable assessment. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is fundamentally flawed, with substantial gaps in evidence that severely undermine its conclusions. This region supports internationally important seabird populations, many of which are already in decline. However, the application has not demonstrated to the required evidential standard that these species will not face adverse effects. Key foraging areas and migratory pathways, where the turbines are to be sited, have not been adequately assessed for implications regarding displacement, collision risk, or habitat loss.

There is a significant contradiction within the application. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, a requirement that arises only when significant harm is

anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not supported by solid evidence.

The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given that baseline data is incomplete and there is insufficient understanding of behavioural responses.

Placing turbines within a recognised migratory corridor presents an additional and significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term consequences of continued mortality in this corridor, as well as potential impacts on species with comparatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, preventing a lawful conclusion in support of consent.

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

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These failures hinder a thorough evaluation of the 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 assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It overlooks this area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of isolated and unchanging assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active

places of burial and spiritual practice, yet they are mischaracterised as static features. The assessment fails to consider their continued use and meaning, along with the potential impact of development on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity and are glaringly absent from the assessment, representing a significant shortcoming. The cultural impacts of the development cannot be adequately understood without these considerations.

There are additional concerns related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as that of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been observed. The lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

A crucial procedural failure is the omission of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus preventing a lawful determination.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and locations. The disregard for both tangible and intangible heritage, alongside a failure to recognise living cultural practices, constitutes a clear deviation from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and legal obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been properly evaluated, and the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. The issues that caused the refusal of the Lewis Wind Power proposal in 2008 are repeated in this application. It presents a scale of industrialisation that is still deemed unacceptable, despite being submitted under a policy framework that places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an inadequate evidential basis for the application. Critical gaps in baseline data exist, and the design envelope remains undefined. Mitigation measures have not been specified, and key impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. The Environmental Impact Assessment is thus incomplete and does not facilitate a full understanding of likely 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 omission of a full Social Impact Assessment is a material deficiency. These failures hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. There is insufficient evidence that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impact of offshore and onshore elements has not been properly assessed, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

Overall, the application is unfit for determination both procedurally and substantively. The deficiencies in information, combined with policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or invoke relevant regulatory provisions to obtain the necessary 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 wind farm development lacks insight into the environmental and cultural damage that it may cause.

It would seem that it is a rushed, yet irreversible march to colonise the seas around Lewis with dominating and unsightly wind power farms that are not in keeping with the cultural, environmental and rugged scenic beauty of the Western Isles.

Essentially adding an offshore heavy industry to a place where it is unfitting and inappropriate.

Once in place, they will be difficult to remove and any benefits will be heavily outweighed by the impact and blight on tourism, scenery and serenity that the west coast of Lewis is so renowned for.

This simply cannot proceed without the appropriate checks and balances.

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: E7B365F1

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. It addresses serious deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects, derived from an analysis of the Environmental Impact Assessment Report and accompanying documentation. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The nature of the proposal, in terms of scale, proximity, and design, raises critical concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a significant lack of evidential support for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The application employs a flexible design framework, complicating the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. 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.

Substantial conflicts with established policy are evident. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the health and wellbeing of the community. It does not satisfactorily demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses significant challenges in this location, as the large turbines would be positioned in close proximity to the shoreline, leading to serious concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy indicate that the application is incomplete and incapable of facilitating a lawful determination. In light of these factors, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors in this sensitive marine area. This system is biologically vibrant, yet the baseline data remains inadequate, and the methodologies used are insufficient for accurately capturing species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application neglects to adequately acknowledge and assess their active utilisation of coastal regions for foraging and movement. This omission in evaluating their core foraging range and behavioural patterns results in an incomplete understanding of how construction disturbance, noise, and increased activity might affect them. This gap undermines any assertions regarding the absence of significant effects on this species.

Further issues emerge in the assessment of basking sharks, where dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. Such an approach likely leads to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits a meaningful examination of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been accurately identified or assessed. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these concerns, granting consent would not be lawful.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential basis.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has a materially deficient assessment of social impacts, health, and wellbeing, lacking the transparency required for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This creates a significant evidential gap that impedes both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are based on direct engagement and are not speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of these findings, thereby limiting the capacity to assess their significance in the decision-making process.

There is also notable evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be compromised. The application fails to provide a complete evidential basis for evaluating the balance between benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications are significant, as the competent authority is unable to conduct a rigorous socio-economic and health evaluation without the complete Social Impact Assessment. This constitutes a material omission within the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information for support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of 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.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts on these critical resources. A significant concern is the flawed assumption that fishing activity can be moved without consequences. There is no evidence presented that alternative fishing grounds are available or capable of absorbing additional pressures, which is vital information. This lack of clarity poses a risk of overfishing in other areas and could have severe economic repercussions for the local fishing fleet. An evidence-based assessment is essential to understand the true impacts on fisheries and livelihoods.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive “wall of light” effect that would drastically change the night-time environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The standard of evidence required to exclude such adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal illustrates a significant failure to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits the central issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the extent of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There is an evident lack of a comprehensive and reliable evidential basis for decision-making within this application. Notable gaps exist in baseline data, the proposal relies on a vague design envelope, mitigation measures remain unspecified, and crucial impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications have not been addressed. Consequently, the Environmental Impact Assessment is incomplete and does not provide a full understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes statutory obligations as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a significant oversight. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It lacks evidence of biodiversity protection, preservation of natural environments and cultural heritage, acceptable health and wellbeing impacts, and fails to demonstrate a net economic benefit due to the absence of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent with each other. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would induce considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism signify permanent impacts that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, coupled with policy inconsistencies and unresolved environmental risks, hinder the possibility of a lawful and evidence-based decision. The competent authority must either deny consent

based on these grounds or utilise relevant regulatory provisions to demand the necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 00536F61

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, 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 rich cultural identity. The unprecedented scale, proximity to the shoreline, and design of this proposal raise significant concerns about its adherence to statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and associated documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, with missing critical environmental data and limited, inconsistent baseline information. Key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation unable to provide a comprehensive understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not substantiated by robust evidence.

The application is fraught with substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

Moreover, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy further illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not give a complete or clear account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks specific details on turbine dimensions, layouts, or configurations, creates substantial uncertainty. This

situation undermines the assessment's credibility and leads to a failure in accurately presenting the impacts, preventing both the public and the competent authority from grasping the true environmental consequences.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be managed later hinders any substantial evaluation of effectiveness or understanding of residual impacts. This approach of deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are clearly identified prior to determination.

Significant evidential gaps are present, such as missing baseline data, limitations in methodology, and the use of assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the extent and significance of impacts, especially where conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not meet the evidential standard required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, including obligations relating to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the available information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to a lack of reliable understanding of ecological receptors. This area is characterised by a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of various species, resulting in an unreliable evidential basis for evaluating potential impacts.

A significant oversight in the assessment is the failure to properly recognise and evaluate the presence of otters, a European Protected Species. The application does not account for their active use of coastal areas for foraging and movement, neglecting

to consider their core foraging range and behavioural patterns. Consequently, the potential impacts of construction disturbance, noise, and increased activity on this species have not been sufficiently assessed, undermining any conclusions regarding the absence of significant effects.

The assessment of basking sharks also exhibits serious deficiencies, primarily due to a reliance on aerial surveys, which introduces substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or properly consider such data leads to an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk posed to marine species and their habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment 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.

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 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 evaluation of marine life and fisheries associated with the proposed development is fundamentally flawed and fails to adequately assess both ecological and socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the application does not sufficiently demonstrate how these vital habitats and activities will be safeguarded from significant disruptions.

One of the major concerns is the presumption that displacing fishing activity can occur without repercussions. The application lacks any substantiation regarding the availability or accessibility of alternative fishing grounds that could absorb the additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas, with potential adverse economic impacts for the local fishing fleet. The absence of a detailed and evidence-based assessment means that the consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable threats to marine species, especially due to the underwater noise generated during the construction phase. The use of high-energy hammer piling for extended periods is anticipated to create disturbances that could affect marine life over large distances, notably the local bottlenose dolphin population.

The application downplays these predicted disturbances, raising concerns that are not sufficiently backed by evidence.

There is also a troubling inconsistency within the application; it acknowledges the necessity of licences for any harm to European Protected Species while simultaneously characterising those impacts as negligible. This contradiction calls into question the integrity of the assessment and raises serious compliance issues regarding the Habitats Regulations, especially when harm is anticipated to a level that would require legal authorisation.

Furthermore, the assessment does not adequately account for cumulative impacts stemming from multiple stressors, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which ultimately prevents a determination that the proposal is sustainable.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These significant deficiencies hinder a thorough evaluation of the effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant gap in the application. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly with the rise of astro-tourism. The proposal introduces permanent red aviation lighting that is visible over long distances, creating an intrusive "wall of light" effect across the western horizon, thereby fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the critical role dark skies play in the area's identity. The lack of consideration for these impacts results in a significant deficiency in the overall assessment of landscape and environmental factors.

More alarmingly, there has been no evaluation of how these lighting changes might affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application does not

include any assessment of lighting impacts or a study on phototaxis, thus failing to consider the potential adverse effects of aviation lighting on these species and the increased risk of mortality they face.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

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

From a policy perspective, the omission contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines a broader understanding of landscape and seascape impacts, as the character of night-time environments is integral to the overall context.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development in accordance with statutory duties, national policy, and evidential standards. It mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current proposal, however, is presented against a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for determination, including critical gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, the complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact

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

Moreover, the proposal conflicts with National Planning Framework 4, as it does not protect biodiversity, natural places, or cultural heritage. It also fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring their 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, at times, inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Wrong

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: 16192D05

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. It is grounded in a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development is proposed off the west side of the Isle of Lewis, a region noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

Substantial concerns arise from the scale, proximity, and design of the wind farm regarding its alignment with statutory requirements, national policy, and sustainable development principles. The application lacks an adequate evidential basis for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. The use of a flexible design framework complicates the understanding of potential significant effects, while the proposed mitigation measures, which have yet to be specified, hinder any assessment of their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack substantial evidence.

There are notable policy conflicts, as the proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is especially pertinent concerning biodiversity, natural habitats, cultural heritage, and community health and wellbeing. It does not sufficiently prove that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts undermine the statutory tests necessary for consent and challenge the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns about landscape capacity, visual dominance, and environmental impact due to the large turbines being positioned in close proximity to the shoreline. The combined effect of inadequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

The assessment also inadequately addresses basking sharks, relying heavily on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or give proper consideration to this data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological shortcomings mean that the claims of negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of sufficient baseline data hampers any meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions, leaving considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been conducted appropriately. This uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, the granting of consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the notion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on the ornithological landscape of the Isle of Lewis. The assessment provided is fundamentally flawed, exhibiting considerable gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline.

However, the application fails to convincingly demonstrate that these species will remain unaffected, especially given that the development is situated within key foraging areas and migratory pathways. There is insufficient evaluation of the potential implications of displacement, collision risk, and habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that its conclusions are not substantiated by the available evidence. The assessment does not adequately ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding grounds has not been fully considered, and the reliance on modelling methods introduces uncertainties, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a known migratory corridor adds a significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality in this corridor and the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the necessary evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that would support consent.

The identified deficiencies also reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these factors render the assessment unreliable, plagued by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a robust evaluation of potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fails to adequately consider the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application approaches heritage in a reductive manner, treating it as a collection of isolated and static assets. This perspective ignores the ongoing social, cultural, and spiritual roles these heritage sites

play within the community.

Significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features despite being active places for burial and spiritual practice. This oversight fails to recognise their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete, disregarding the integral role these sites have in community life.

Moreover, the application neglects to address intangible cultural heritage, including the Gaelic language and traditions, which are essential to the identity of the area. The absence of these elements from the assessment is a critical omission, as it prevents a comprehensive understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, a vital procedural flaw is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, 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 acknowledge living cultural practices represents a clear violation of policy requirements.

Overall, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not sufficiently justify the potential cultural costs associated with the proposal.

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.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial flaw within the Environmental Impact Assessment. The West Lewis coastline is notable for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism appeal. The proposal incorporates permanent red aviation lighting that would be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This omission is critical given the significance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. As a result, there exists a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of examination of impacts on nocturnal wildlife. Species

such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and heighten the risk of collision. The application fails to provide a lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may affect these species or lead to increased mortality.

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

In the absence of a proper assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the broader ecosystem.

Collectively, the failure to assess dark skies and nocturnal wildlife presents a major evidential shortcoming. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was established. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in numerous critical areas.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, and a lack of specified mitigation measures. Additionally, key impact pathways have been omitted, including those concerning nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to enable a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These deficiencies inhibit the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

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

Uncertainties regarding environmental risks remain significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

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

It is therefore formally requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0D381044

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development, especially in light of its scale, proximity, and design.

The application presents a troubling lack of sufficient evidential support for a lawful determination. There are crucial gaps in environmental data, and baseline information is both limited and inconsistent, leaving many aspects of the proposal undefined. The flexible design framework employed obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a comprehensive or informed assessment of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and serious policy inconsistencies with the proposal. It seems to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. Furthermore, the application does not convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to affirm the development's acceptability in policy terms.

The unprecedented scale of this proposal, characterised by large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information provided, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance signify that the application is incomplete and inadequate for lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable analysis of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally improper and contradicts the intentions of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly defined prior to any decision-making.

Significant evidential shortcomings are present, including gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. A lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, including provisions regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been comprehensively assessed or if adequate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of defined mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These issues obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application suffers from significant inadequacies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a detailed and reasoned analysis of realistic alternatives based on their environmental implications, the submission offers a narrative detailing the evolution of the project. This narrative does not adequately demonstrate that less

harmful options have been identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a notable lack of a transparent, evidence-based comparison regarding alternative offshore locations, scales of development, or design configurations. In particular, the application does not convincingly show that the developer has thoroughly considered the possibility of positioning the turbines further offshore, where impacts on visual aesthetics, ecological systems, and coastal areas could potentially be lessened. The sensitivity of the West Lewis coastline highlights the critical nature of proximity to shore in evaluating the impacts; therefore, the absence of this essential analysis raises concerns about whether the proposed siting is truly the least damaging choice.

These deficiencies also extend to the evaluation of cable routing and landfall assessments. There is insufficient evidence to indicate that alternative routes have been adequately examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis signal a failure to apply mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout considerations, or infrastructure routing. This shortcoming represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine the existence of less harmful and more appropriate alternatives. Without a thorough alternatives assessment, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and the wellbeing of communities. The lack of a structured and comparative assessment constitutes a material omission that leads to the conclusion that the application has not undergone adequate scrutiny and therefore cannot receive lawful approval.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species exhibits significant deficiencies, failing to deliver a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the baseline data remains incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of key species, undermining the evidential basis for evaluating impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The absence of an evaluation of their core foraging range and

behavioural patterns results in a failure to adequately consider the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions regarding the absence of significant effects on this species.

Further weaknesses appear in the assessment of basking sharks, with a reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. Neglecting to incorporate or properly assess such data results in an incomplete baseline, consequently weakening the reliability of the presented conclusions.

These methodological shortcomings render the conclusions of negligible or non-significant effects reliant on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs meaningful evaluation of cumulative and indirect impacts, which includes considerations for seasonal variation and broader ecosystem interactions. This uncertainty complicates understanding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the obligations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty that has been 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 unsupported conclusions renders the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable, presenting significant internal inconsistencies and substantial gaps in evidence that undermine its findings. Key foraging areas and migratory pathways, essential for the internationally important seabird populations along the west coast of the Isle of Lewis, are not adequately protected. The application fails to demonstrate, with the required evidential standard, that these species will remain unaffected. Moreover, the siting of turbines within a recognised migratory corridor creates considerable risks, as it potentially acts as a barrier for species migrating between the United Kingdom and Iceland.

A glaring contradiction exists, wherein the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and raises concerns that its conclusions are unsupported by the evidence. The methodologies used in the

assessment appear to underestimate potential mortality, particularly given that baseline data is lacking and behavioural responses of the species are not well understood.

Furthermore, the assessment does not sufficiently consider the seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, or fully account for the importance of their feeding grounds. The reliance on modelling approaches adds a layer of uncertainty, especially for species already experiencing severe declines, such as Kittiwakes and Fulmars.

From a regulatory viewpoint, the application does not meet the evidential threshold required to establish no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful conclusion in support of consent.

In addition, the identified deficiencies constitute 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 in direct conflict with national policy. Collectively, these factors lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity presented in this application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as isolated and static features, neglecting their ongoing social, cultural, and spiritual functions within the community.

Significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are classified as static elements, despite being active places of burial and spiritual practice. This categorisation fails to account for their continued use and meaning, as well as the impact that development would have on their surroundings. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Moreover, the assessment entirely overlooks the intangible aspects of cultural heritage, including the Gaelic language and the traditions that shape the identity of the area. These critical elements are absent from the evaluation, representing a significant omission that hinders a proper understanding of the cultural impact of the proposed development.

There are also serious concerns about community rights and engagement. The Gaelic-

speaking population, with its unique cultural identity recognised as an Indigenous People, has not been provided with a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to uphold established principles of participation concerning cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this essential evaluation, the competent authority cannot fulfil its legal obligations to assess the social, cultural, and economic impacts on the island community, making the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices represent a clear departure from necessary policy requirements.

Ultimately, the combination of these failures results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application lacks a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been thoroughly integrated into the main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process.

An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary 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 should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, a lack of development, and a strong feeling of remoteness. The addition of large-scale turbines near the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

Moreover, the application does not sufficiently depict the scale of the visual changes anticipated. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence suggests that the viewpoints selected may overlook the most sensitive receptors or fail to address worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an underestimation of visual impact, calling into question the credibility of the assessment.

Another significant oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting that visually and spatially relates to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating them as isolated assets, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The degree of change proposed is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks a comprehensive assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. Given the high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, and monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of

sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential effects on marine species and habitats that are already recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the

credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is insufficient and fails to account for the full range of impacts arising from what constitutes a single integrated project. The proposed offshore turbines and onshore works are interconnected yet evaluated independently, leading to a fragmented perspective that conceals the true magnitude of environmental and socio-economic consequences.

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

By omitting or postponing the evaluation of onshore impacts, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed collectively, yet the distinct separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain inadequately explored.

Moreover, there are serious risks to sensitive habitats such as machair systems and peatland environments, which are protected under policy. The application does not establish that impacts on these habitats have been thoroughly assessed or that

suitable avoidance measures have been implemented, creating a clear evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that undermines the objectives of renewable energy development. This issue is not sufficiently addressed in the application, which fails to demonstrate that the overall carbon balance remains positive.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This lighting will fundamentally change the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are a vital aspect of environmental quality, cultural identity, and tourism value in the area.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is a significant oversight, especially considering the increasing importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The failure to assess these impacts represents a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no consideration of how the proposed lighting will affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and raise the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may influence these species or contribute to increased mortality rates.

This issue is aggravated by the reliance on daytime survey data for the ornithological

assessment, which fails to account for nocturnal activities or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this concern has not been examined. The lack of site-specific night-time data results in a critical deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse consequences. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, 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 areas and environmental quality. They also weaken the overall evaluation of landscape and seascape impacts, as the night-time character is a crucial element of the environment.

Overall, 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 unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards for sustainable development. It does not satisfy statutory duties, national policy, or evidential standards. Similar issues were present in the rejected 2008 Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current application is under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant gaps in the information provided. The application relies on an undefined design envelope and on unspecified mitigation measures, which are critical oversights. Essential impact pathways have been omitted, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to present a full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the 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 and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain uncertain and potentially significant. The assessments are incomplete and sometimes inconsistent. The evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should refuse consent or require the submission of the missing information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

N4 conflicts with the Development Plan and NPF4

- N4 harms protected seabirds
- N4 harms vulnerable and protected marine life
- N4 harms humans living in close proximity
- N4 conflicts with the landscape and character of the West Side of Lewis
- N4 harms visual amenity by introducing an industrial scale that clashes with the horizon
- N4 conflicts with and threatens tourism
- N4 harms dark skies
- N4 conflicts with transport capacity
- N4 harms heritage and other historic sites
- N4 causes cumulative harm that is long-term and difficult to reverse
- N4 conflicts with biodiversity policy
- N4 threatens community identity, tradition, and the distinct character of the West Side

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D57A54C7

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

Dear Sir/Madam

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

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

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

The unprecedented scale of the proposal in this area, with large turbines being positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on environmental effects, the submission presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the significant impact of proximity to shore, the lack of such analysis prevents any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies extend to cable routing and landfall assessment, revealing 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 failure to establish a clear avoidance strategy and the lack of comparative analysis show that mitigation by design has not been applied, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been reduced through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, obstructing the competent authority from understanding whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be asserted that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy 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 significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This area represents a sensitive and biologically vibrant marine system, yet the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a solid evidential foundation for evaluating impacts.

A significant shortcoming involves otters, a species afforded protection under

European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their core foraging range and behaviour results in an insufficient evaluation of the potential effects stemming from construction disturbances, noise, and heightened activity. As a result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate a regular occurrence of these sharks in the waters concerned. The neglect to incorporate or adequately consider such data culminates in an incomplete baseline, further eroding the reliability of the conclusions drawn.

These methodological shortcomings indicate that the assertions of negligible or non-significant effects rely more on assumptions than on sound evidence. The lack of adequate baseline data also hinders a meaningful analysis of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This results in considerable uncertainty about the actual extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime as well as the National Planning Framework 4, due to the improper identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is not legally permissible to grant consent.

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, thereby substantiating the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises within the application, where the developer asserts there

will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the necessary evidential threshold to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory findings, 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 and obstructs a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding the protection of biodiversity and natural assets. The failure to convincingly demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with this application is significantly lacking in transparency and is therefore not compliant with legal requirements. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local residents, the complete report has not been made available to the public. This absence creates a considerable evidential gap, limiting both public understanding and the capacity of the competent authority to fully assess the social risks highlighted in the developer's own research.

Summaries that are available reveal that local residents are already experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the

proposed development. These findings stem from direct community engagement and should be taken seriously rather than dismissed as speculation. However, the lack of access to the comprehensive assessment hampers proper scrutiny of these findings and obstructs a thorough evaluation of their importance in the decision-making process.

Moreover, there is documented evidence suggesting that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" explicitly mentioned in the developer's own findings. These adverse impacts have not been adequately considered in the main application, nor have they been given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the actual social and human costs of the proposed development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health repercussions is essential for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a full evidential basis to evaluate the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate any harm; however, the evidence available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, there can be no demonstration of compliance with this policy.

The implications of these procedural shortcomings are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with existing evidence of adverse effects, leads to an incomplete and unreliable evaluation. This situation precludes a lawful determination and further reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly flawed and does not adequately capture the extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unobstructed Atlantic horizon, natural state, and pronounced sense of isolation. The proposed installation of large-scale turbines in close proximity to the coast would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a lasting and irrevocable alteration of the

landscape.

Moreover, the application inadequately conveys the scale of this visual transformation. The turbines would overshadow views from residential locations, historical sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately reflect this level of impact or its significance, particularly within the context of such a delicate landscape.

There are also serious methodological issues concerning the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints might not effectively capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the assessment's reliability.

Additionally, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interlinked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these sites in isolation rather than recognising their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case evaluation further weakens any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

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

causing substantial disruption.

A major concern arises from the flawed assumption that fishing activities can be relocated without adverse effects. The application lacks evidence showing that alternative fishing grounds are available and suitable for increased pressure. This gap in information is crucial, as displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a well-supported assessment, understanding the effects on fisheries and local livelihoods is compromised.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to disrupt a wide area, adversely affecting marine life such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the seriousness of these effects without adequate justification.

There is a notable inconsistency in the application where the necessity for licenses to harm European Protected Species is recognised, while simultaneously portraying impacts as negligible. This contradiction weakens the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, especially in situations where harm is expected to an extent that requires legal approval.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not provide evidence of compliance with National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, which obstructs any assertion that the proposal aligns with sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks an evaluation of how this lighting will impact visual amenity, landscape character, and the experience of residents and visitors. Given the significance of dark skies to the local identity and the emerging sector of astro-tourism, this omission represents a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of the impacts on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including disorientation and increased collision risk, have not been addressed.

The ornithological assessment relies solely on daytime survey data, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the absence of these assessments conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

In summary, the complete lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unsuitable for a lawful determination.

SUMMARY

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

Critical gaps in baseline data are apparent, alongside the use of an undefined design envelope. The reliance on unspecified mitigation measures and the omission of vital

impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a full understanding of potential significant effects and residual impacts.

Procedurally, the proposal suffers from clear failures. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a significant omission. Such shortcomings obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not protect biodiversity, natural places, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and cannot evidence a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, as well as inconsistencies within those assessments, mean that the evidential standard required to rule out adverse effects has not been achieved. This situation activates the precautionary principle, precluding a lawful conclusion about the acceptability of impacts.

The proposal would bring about considerable and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse impacts on tourism represent permanent consequences that cannot be adequately mitigated.

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

Additional Comments

Huge concerns about whether this is the best approach in the long term for generating energy. Concerned that the maintenance and upkeep has not been considered nor the long term impact on the islands. Specifically, worried about impact on wildlife as well as the view being obliterated. I have general fears about this not being thought through for future generations. It is such a precious, unique landscape. There are so many questions over wind power and how effective it will be. I also feel dubious about the benefits that the local community will feel when such a precious asset is damaged.

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: 51C51964

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. Concerns arise from a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

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

Moreover, the application presents clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are closely intertwined. Instead of

acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, viewing heritage merely as a collection of isolated and static assets.

A significant shortcoming in the assessment is its treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are classified as static features within the assessment. This misrepresentation overlooks their ongoing significance and the effects development may have on their surroundings. Consequently, the evaluation of cultural impacts remains incomplete, disregarding the cemeteries' role within community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, various traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity but have been entirely overlooked in the assessment, representing a major oversight. Without taking these factors into account, it is impossible to fully grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population embodies a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the credibility of the assessment and fails to honour established principles of participation for decisions that impact cultural and environmental interests.

Another critical oversight is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders the determination process unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, indicates a clear violation of policy directives.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory requirements has resulted in a notable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, leaving the application without a solid foundation for determining the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the

sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual transformation. The size and nearness of the turbines will dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining characteristics of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a possibility that the scale of the visual impact has been downplayed, which undermines the assessment's reliability.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case analysis further weakens any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage.

These shortcomings preclude a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is also ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly outlined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is applicable to potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Moreover, the deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether adequate safeguards are established to respond to pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, which fails to offer a thorough evaluation of both ecological and socio-economic impacts. It has been established that 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 how these crucial uses and habitats can be preserved or maintained without considerable disruption.

A notable concern lies in the assumption that fishing activities can be displaced without negative repercussions. The application lacks evidence to support the claim that alternative fishing grounds are both available and capable of withstanding additional pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction activities. The anticipated high-energy hammer piling, conducted over an extended duration, is expected to disturb marine life over large distances, particularly affecting species like dolphins. The predicted disruption to a substantial portion of the local bottlenose dolphin population raises grave concerns, yet the application seems to downplay the significance of these potential effects, lacking sufficient evidence to support such minimisation.

There is also a striking inconsistency within the application, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and raises alarm over compliance with the Habitats Regulations, particularly concerning anticipated harm that would require legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with 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 consequences for marine biodiversity, thus undermining any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies render the

assessment incomplete and unreliable. These flaws ultimately inhibit a robust evaluation of the impacts on marine life and fisheries.

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it lacks a quantified evaluation of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. In spite of this growth, the application does not consider how the proposed industrialisation of the seascape and the associated decline in environmental quality would affect Tourism Gross Value Added or broader economic resilience. In the absence of such analysis, it is impossible to ascertain whether the proposed development would result in a net economic benefit or jeopardise an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in promoting tourism. It overlooks the significance of unspoiled landscapes and dark skies in shaping visitor experiences, particularly in relation to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the omission of tourism impact assessments carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity of demonstrating net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental factors driving visitor behaviours, and acknowledge the island's economic dependencies culminates in a substantial evidential deficiency. This gap hampers a thorough evaluation of the economic consequences, 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 standards for sustainable development as mandated by statutory duties, national policy, and evidential benchmarks. This application mirrors the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is now being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential foundation necessary for a proper determination is incomplete and unreliable. Notable gaps exist in the baseline data, and the application relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. This results in an incomplete Environmental Impact Assessment, which fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal is in clear conflict with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural spaces, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism are all permanent effects that cannot be adequately mitigated.

In conclusion, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with policy conflicts

and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate regulatory provisions to demand the submission of the missing information.

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

Additional Comments

If there was going to be massive community compensation there would be more of an argument but even in this area, it is just a Canadian firm profiting off the local council's mistakes. How is this fair for the people? They deserve better. There's no evidence for what effect this will have on the people living in the area health wise either. We are being treated as guinea pigs and I just don't understand how this can be fair. I am completely opposed to this disproportionate proposal and can only wish the people at the head of it would take the time to get to know the locals of the area and see what the land means to them. Our land is not for sale. The community is not for this. It is completely unfair and disgrace to nature.

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: F044723F

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a detailed review of the Environmental Impact Assessment Report alongside other supporting documents, highlighting several material deficiencies related to planning, environmental factors, cultural concerns, and procedural aspects. Situated off the west side of the Isle of Lewis, the proposed development area is characterized by its Atlantic-facing coastline, a near-pristine environment, and a significant cultural identity. The size, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidence for a lawful determination. There are substantial gaps in critical environmental data, with baseline information that is both limited and inconsistent, and many elements of the proposal remain undefined. The flexible design framework employed obscures an understanding of likely significant effects, and the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the supporting documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not backed by robust evidence.

There are evident policy conflicts within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. The application fails to establish that it can meet national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies are crucial as they pertain to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed wind farm is unprecedented for this location, with large turbines set very close to the shoreline, which raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these issues, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data provided is incomplete. The methodologies employed fail to adequately document species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential effects from construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any assertions regarding the absence of significant effects on this species.

Further concerns arise regarding basking sharks, as the reliance on aerial surveys is prone to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that conclusions of negligible or non-significant effects are based on assumptions rather than sound evidence. The lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have been inadequately executed. The uncertainty introduced precludes 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 shortcomings obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development contains significant flaws and inconsistencies that undermine its credibility. It fails to provide adequate evidence that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The area is vital foraging ground and includes key migratory pathways, yet the assessment does not thoroughly

analyse potential impacts related to displacement, collision risk, or habitat loss.

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

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

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

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

Moreover, these deficiencies result in a lack of compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided in the application is fundamentally flawed, particularly regarding the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. Instead of recognising these relationships, the application adopts a reductive perspective, treating heritage as a

collection of isolated, static assets. Such an approach fails to acknowledge the ongoing social, cultural, and spiritual roles these elements play within the community.

A significant shortcoming is evident in how the assessment treats culturally important sites, specifically the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as mere static features. This misrepresentation ignores their continued use and significance, as well as the potential impacts of the proposed development on their surroundings. Consequently, the evaluation of cultural effects remains incomplete, overlooking the cemeteries' essential role in community life.

Additionally, the application neglects to consider intangible cultural heritage elements, which include the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, representing a major oversight. Without addressing these components, a comprehensive understanding of the cultural impact of the development is unattainable.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination of the proposal.

From a policy standpoint, these identified deficiencies directly conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside a recognition of living cultural practices, signifies a clear deviation from policy obligations.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory requirements create a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the full Social Impact Assessment significantly undermines the integrity of the application. The developer engaged local residents through focus groups as part of the assessment, yet the comprehensive report remains unpublished. This omission creates a critical evidential gap that hinders public understanding and the competent authority's ability to evaluate social risks identified by the developer's own research.

Available summaries highlight that residents are experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is limited, which restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this, the impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the complete Social Impact Assessment obscures the real human and social costs associated with the development.

The implications of this lack of disclosure extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and function may be at risk. The failure to provide the complete dataset results in an application that does not present a comprehensive evidential foundation 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. While development must promote positive health outcomes and mitigate harm, available evidence suggests existing adverse effects that have not been fully revealed. The absence of the full assessment precludes any demonstration of compliance with this policy.

The procedural ramifications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy 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 existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped landscape, and profound sense of remoteness. This development would introduce a continuous and dominant industrial presence that fundamentally alters the region's character, leading to a permanent and irreversible transformation of the landscape.

The assessment of visual impacts associated with this proposal is significantly lacking, failing to accurately represent the magnitude of change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, severely affecting visual amenity and undermining the region's defining qualities of naturalness and remoteness. There is a clear failure to convey the extent of these impacts and their significance in relation to the sensitive nature of the landscape.

Methodological flaws further compromise the assessment, particularly in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not adequately capture the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns about the accuracy of the reported visual impact and questions the reliability of the overall assessment.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently addressed. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape interconnected with the Atlantic horizon. The assessment treats these heritage assets as isolated entities 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, altering the context in which heritage assets are experienced and diminishing their relationship with the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been properly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly 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. The lack of a thorough worst-case assessment further erodes any claims of policy compliance.

Finally, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, not reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks critical detail in its assessment of construction and pollution risks, which is essential for evaluating potential environmental effects. With substantial seabed preparation and installation works planned for a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. Instead, the application relies on mitigation and contingency measures that are set to be prepared after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

The reliance on undefined future measures raises particular concerns given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures for these incidents.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory viewpoint, the deferral of crucial environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent, and a lawful determination cannot be made in the absence of such information. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

A critical flaw in the application is the assumption that fishing activities can be displaced without any repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or capable of bearing increased pressure. This lack of information is concerning, as displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise resulting from construction activities. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across considerable distances, which could adversely affect species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects without adequate supporting evidence.

In addition, there is a notable inconsistency within the application regarding the requirement for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the reliability of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal approval.

The assessment also neglects to address cumulative impacts resulting 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 proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies collectively render the assessment incomplete and untrustworthy. These issues hinder a robust 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 West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that would be visible over considerable distances, creating an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is significant, particularly as the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. The importance of preserving dark skies is underscored by the area's identity and the growth of tourism sectors such as astro-tourism.

Moreover, the Environmental Impact Assessment does not address the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the application overlooks the potential adverse effects of aviation lighting on these species, increasing their mortality risk.

The issue is further compounded by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated hazards. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting. This lack of site-specific night-time data highlights a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural spaces and environmental integrity. They also undermine the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

TOURISM

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

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

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

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal highlights significant shortcomings in its adherence to sustainable development principles when evaluated against statutory duties, national policies, and evidential standards. This application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power

proposal, where the extent of industrialisation was deemed unacceptable. It is now being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

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

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6EF10B36

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 application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or

configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the Environmental Impact Assessment. As a result, the projected impacts may not accurately represent the actual development, which obstructs both public understanding and the competent authority's ability to assess the true environmental effects.

Moreover, the proposal places considerable emphasis on undefined mitigation measures, monitoring strategies, and management plans. This deferral of essential information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime. The regime mandates that likely significant effects and their mitigation be established clearly before determination, and this proposal fails to meet that requirement.

The assessment also suffers from substantial evidential deficiencies, including gaps in baseline data and methodological limitations, leading to the use of assumptions instead of site-specific evidence. This creates uncertainty surrounding the scale and significance of impacts, especially where conclusions about negligible or non-significant effects are drawn without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt, invoking the precautionary principle particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Taken together, these factors—an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data—render the Environmental Impact Assessment Report both unreliable and incomplete. Such deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives in accordance with the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on environmental impacts, it presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application

does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in determining impact makes the absence of this analysis significant, preventing any determination that the proposed siting is the least damaging option.

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

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the overall finding that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly lacking and fails to offer a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of species within this marine system. Consequently, the assessment does not present a robust evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The oversight regarding 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 oversight undermines any conclusions made about the absence of significant effects on this species.

Further issues are evident in the evaluation of basking sharks. The reliance on aerial surveys creates significant detection bias, particularly in the Atlantic conditions, likely

leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate regular use of these waters. The failure to integrate or adequately consider such data culminates in an incomplete baseline, which diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data obstructs any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk posed 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 has not properly identified or assessed protected species. The degree of uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, reinforcing the assertion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

especially where baseline data is lacking and behavioural responses remain poorly understood.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency significantly undermines the Environmental Impact

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts, landscape, and seascape is seriously lacking. It does not accurately reflect the significant changes and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed large-scale turbines would create a constant industrial presence near the shore, which would fundamentally change this character and lead to an irreversible transformation of the landscape.

The application fails to properly illustrate the scale of the visual change that would occur. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the level of this impact or its significance in relation to such a sensitive landscape.

Concerns arise regarding how visual viewpoints were selected and presented. Evidence indicates that some viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially for key cultural heritage sites and important landscapes. This raises the possibility that the visual impact has been understated, which undermines the reliability of the assessment.

Another shortcoming is the lack of evaluation of how landscape, seascape, and cultural

heritage are interconnected. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially connected to the Atlantic horizon. The assessment treats these as separate entities rather than 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 connections and change how heritage assets are experienced, altering their relationship with the natural horizon. This represents not just a visual impact, but also a broader cultural and spatial harm that has not been adequately examined in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of change is at odds with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

Overall, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks lacks essential detail required for evaluating potential environmental effects. This proposal necessitates significant seabed preparation and installation operations within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that are to be developed after consent, which impedes any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the surrounding environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to furnish sufficient information on the methods for prevention, control, or monitoring of these risks.

Moreover, there is ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies, it becomes impossible to ascertain the

extent, duration, or ecological ramifications of these impacts. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the absence of such information renders lawful determination impossible. The application also fails to prove compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and fails to deliver a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not adequately demonstrate how these essential uses and habitats will be protected or maintained without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that suggests alternative fishing grounds are available or able to handle increased pressure. This lack of information is particularly concerning, as displacing fishing activities could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. An evidence-based assessment is necessary to understand the potential impacts on fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, especially due to underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to disturb marine life across extensive areas, with species such as dolphins likely to be significantly affected. The application fails to adequately address the predicted disturbance to a considerable portion of the local bottlenose dolphin population and downplays the significance of these effects without sufficient supporting evidence.

There is also an evident contradiction within the application regarding the licensing needed to harm European Protected Species, while simultaneously asserting that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly in scenarios where harm may necessitate legal authorisation.

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

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal signifies sustainable development.

In summary, the deficiencies highlighted—such as the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies—render the assessment incomplete and unreliable. These issues obstruct a robust 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 Environmental Impact Assessment is notably deficient in its evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is renowned for its remarkably dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal to install permanent red aviation lighting would result in a pervasive and disruptive “wall of light” effect along the western horizon, which would drastically change the night-time environment.

There is a lack of assessment regarding the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly critical given the area’s identity and the burgeoning astro-tourism sector that relies on preserving dark skies. The failure to evaluate these impacts introduces a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of how such lighting may affect nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit heightened sensitivity to artificial lighting, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means that the potential adverse effects of aviation lighting on these species, and the associated increase in mortality rates, remain unexamined.

This shortcoming is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours and

associated risks. For instance, Kittiwakes, which may forage or migrate during the night, also face disorientation due to artificial light. The lack of site-specific night-time data creates a significant gap in understanding the ecological consequences.

Without a thorough examination of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be negatively impacted. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, the omissions in the assessment contradict National Planning Framework 4 regarding the safeguarding of natural environments and the quality of the environment itself. This lack of evaluation also detracts from a comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall setting.

In summary, the failure to address dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and targeted species analysis leads to an incomplete application that cannot adequately support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the primary issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a complete or reliable evidential basis for determination.

There are significant gaps in baseline data, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of critical impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, further undermine the application. As such, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a material omission, hindering the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts with National Planning Framework 4, failing to protect

biodiversity, natural places, and cultural heritage. It does not adequately demonstrate acceptable health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory provisions to mandate the submission of the missing information.

A formal request is therefore made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

The community in barvas use the machair for common grazing and potato planting, an important part of community life and our wellbeing

We were not properly advised of what would happen, just told it was going to happen. We have felt there is little point in challenging as the attitude from those not closely impacted is there was no choice

This will affect my ability to cut the peats, animals grazing and huge parts of community life. The light and the noise will affect me and my family being so close to the nearest windfarms.

I already have health issues and concerned about how much worse this will make it. Life on the island, including scenery and bird life is why we are still here. There has been a feeling of us not being listened too throughout this. And these changes will affect my families future on the island and the grandchildren.

I have a real fear for the future.

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: 3DB6325C

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

Dear Sir/Madam

This letter presents a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough examination of the Environmental Impact Assessment Report and the accompanying documentation reveals significant deficiencies across multiple areas, including planning, environmental factors, cultural considerations, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, the baseline information presented is limited and inconsistent, and essential components of the proposal remain unspecified. The flexible design framework employed hampers a clear understanding of the potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, thereby undermining claims of negligible or non-significant effects due to the lack of robust evidence.

Substantive conflicts with existing policy frameworks are evident. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, addressing climate interests, and maintaining environmental integrity. Such conflicts directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the development's policy acceptability.

The proposal's scale is unprecedented for this location, featuring large turbines placed in close proximity to the shoreline, which raises significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would profoundly alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately depict the magnitude of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential properties, historic landmarks, and popular coastal areas. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence to suggest that the viewpoints chosen may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This could lead to an underestimation of the visual impacts, thus compromising the reliability of the assessment.

Another major shortcoming is the lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact, representing a more extensive cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in terms of safeguarding natural environments and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant locations. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The size, height, and proximity of the turbines would create a dominant and unavoidable presence. Consequently, the resulting transformation is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is inconsistent with the protection of this landscape.

TOURISM

The Isle of Lewis relies heavily on tourism, which has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs. This sector represents up to 16% of the local economy. Despite this significance, the assessment of tourism impacts within the application is materially deficient, failing to evaluate the economic and social consequences for this key sector. While it is acknowledged that 86% of visitors are attracted to the area's scenery, there is no quantified analysis of how the proposed large-scale offshore infrastructure would affect visitor numbers, behaviours, or their overall economic contributions.

Moreover, the application does not account for the environmental quality that underpins tourism. The importance of the island's unspoiled landscapes and dark skies is critical to visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a significant gap in understanding the impacts on a recognised and growing part of the local economy.

The failure to address tourism impacts has broader implications for the island community, which has limited economic diversification. Without a compliant Island Communities Impact Assessment, the economic vulnerabilities faced by local businesses, employment opportunities, and community sustainability have not been adequately evaluated, as required under the Islands (Scotland) Act 2018.

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

In summary, the absence of quantified tourism impacts, the lack of assessment of environmental drivers influencing visitor behaviour, and the oversight of the island's economic dependency create a significant evidential gap. This inadequacy prevents a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns about its alignment with sustainable development principles as outlined in statutory duties, national policy, and evidential standards. It mirrors the issues that led to the

2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal falls short.

Critical gaps in baseline data undermine the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to consider significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects leave the Environmental Impact Assessment incomplete. This lack of thoroughness prevents an understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thereby preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is fundamentally unfit for determination, both procedurally and substantively. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused in its entirety.

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: 9E13973E

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential transparency and reliability in its account of the likely environmental effects associated with the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, leading to considerable uncertainty. This lack of certainty compromises the integrity of the assessment and obscures the actual environmental impacts that may arise from the development. As a result, both the public and the competent authority are left without a clear understanding of the true extent of these effects.

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

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

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

In summary, the deficiencies arising from the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning the seascape, landscape, and visual impacts associated with the proposal is significantly lacking and does not sufficiently reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. Introducing large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to accurately depict the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or represent worst-case scenarios, especially in relation to important cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated assets and does not recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The extent of change is at odds with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

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

In summary, the assessment fails to accurately 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 proposal includes substantial seabed preparation and installation works in a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be prepared after consent has been granted. This approach is deeply concerning as it prevents any meaningful assessment of the adequacy or effectiveness of these undefined future measures.

The West Lewis coastline, known for its clean coastal waters and vulnerable habitats, is particularly sensitive to sediment disturbance and contamination. While the application acknowledges the risks of sediment mobilisation and the potential for accidental chemical or oil spills, it does not sufficiently outline how these risks will be prevented, controlled, or monitored. The uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance further complicates matters. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts on marine species and habitats already recognised as sensitive in the wider assessment.

Moreover, the absence of detailed emergency response procedures exacerbates the situation. By postponing contingency planning until after consent, the application undermines the ability of the competent authority to evaluate whether adequate safeguards are in place to respond to potential pollution events. This deferral introduces procedural risks and raises serious questions about environmental protection at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be evaluated prior to consent. The application fails to demonstrate compliance with necessary 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 surrounding potential impacts render the assessment materially inadequate. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries in the application is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The West Lewis coast is home to a vibrant marine ecosystem and an active fishing industry.

However, the proposal does not adequately demonstrate how these essential habitats and industries can be safeguarded from significant disruption.

A critical concern is the assumption that fishing activities can simply be relocated without negative consequences. The application lacks evidence supporting the availability, accessibility, and capacity of alternative fishing grounds to absorb any increased pressure. This absence of information is notable, as displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet. Without a solid and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, impacting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts that may arise from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these collective 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 mitigate unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity,

and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

A more pressing concern is the absence of analysis regarding the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment for lighting or a study on phototaxis, thus neglecting the potential effects of aviation lighting on these species and their mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly concerning 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 environments is integral to the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife presents a substantial evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and inadequate for supporting a lawful decision.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. The application revisits core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the

level of industrialisation was deemed unacceptable. This new proposal is being considered under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist, as assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I object to the Spiorad na Mara (N4) Windfarm on the following grounds:

The idea of dumping hundreds, if not thousands of tonnes of concrete into the ocean doesn't appear to be in keeping with the 'Green Energy' agenda. Concrete is responsible for around 7% of global carbon emissions in its manufacture, not forgetting carbon emissions associated with the fuel and lubricants required, the steel, copper, rare earths, and other construction materials that will be needed to build and install the wind turbines, their bases and associated infrastructure.

In addition to the energy being used, the damage to the marine environment is beyond calculation. The 2002 Seasearch Survey Report starts the 'Background to Survey' with the words "The Isle of Lewis contains a spectacular variety of unspoilt marine communities. From rocky coast exposed to the full might of the Atlantic swell to the sheltered lagoon complexes of Loch Roag, Lewis offers excellent examples of a range of marine habitats." This report was written by divers undertaking Seasearch surveys for Scottish Natural Heritage, whilst Seasearch was under the Marine Conservation Society umbrella. The survey was conducted between Gallan Head and Dalmore Beach, and into East, West and Little Loch Roag. This work has been restarted in the last couple of years, and several Priority Marine Features have been located within that area – Maerl beds, Native Oysters, and Seagrass beds.

Placing anything on the seabed will cause a change in the flow of the water, and what marine life will be lost? An in-depth survey of each turbine location and cable route should be carried out; from the Roadshows held on the island, it appears that a general "we've looked at the geology, and these species live here" approach has been taken. This is not the case as there are some unique species being found in Loch Roag, just south of the N4 area. This information was gathered last year (2025) and is currently with the Seasearch Coordinator awaiting upload to the Marine Recorder database.

The Gallen Head Trust have spent years to obtain 'Dark Skies' accreditation, and now that seems to be in jeopardy with a large collection of navigation warning lights just miles away. People come to the island, and especially to the Uig area for these dark nights without the glow of manmade illumination. The Environmental Impact Assessment Report, Non-Technical Summary, Volume 1a makes it clear that the developers acknowledge that there will be 'Significant Effects' due to the illuminations.

I am also concerned about the eventual decommissioning of the project. What are the plans being put in place to remove the turbines and infrastructure at the end of their life? Is a fund being created during the lifetime of the project to fund this, or are we expecting whichever company is running the project at the time to foot the bill? And what happens if on the day before the end of the project that the company ceases to exist, leaving the decommissioning to the islanders, or nature?

I believe that a legally binding fund should be set up to take a percentage of the profits to be used for this decommissioning. This fund should be held by the council, or Scottish Government, with any profits being reinvested, and withdrawals only being

allowed for the express purposes of decommissioning.

In conclusion

This is not a good project for the island. A majority of islanders are against the project as it has no real benefit to them, and the upheaval during construction, and the loss of pristine sea and landscape is seen as very detrimental.

This is not a good project for the marine environment. The seas around Lewis are some of the last pristine seas left in the UK, let them stay that way.

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: 8E473C2E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a comprehensive review of the Environmental Impact Assessment Report along with supporting documents, revealing significant material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development bring into question its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while several key components of the proposal are not clearly defined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a complete and informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not backed by adequate evidence.

There exist notable and serious policy discrepancies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural habitats, cultural heritage, and the health and wellbeing of communities. It does not substantiate that it can meet the national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory criteria necessary for consent and hinder the competent authority's ability to determine that the project is acceptable within policy frameworks.

The magnitude of the proposed development is unprecedented for this area, with large turbines being situated close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicate that the application is incomplete and unable to support a lawful decision. In light of these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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.

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 proposed application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the methodologies employed are inadequate, with incomplete baseline data that does not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment does not furnish a sound evidential basis for evaluating potential impacts.

One major shortcoming is the assessment of otters, a European Protected Species, where their active use of coastal areas for foraging and movement has not been properly recognised or evaluated. The omission of their core foraging range and behavioural patterns means that potential effects from construction disturbance, noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions regarding the absence of significant effects on otters.

Further issues arise in the evaluation of basking sharks, which relies on aerial surveys that introduce 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 usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological flaws lead to outcomes of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level 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, as it has not properly identified or assessed protected species. The uncertainty that arises from these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and contains significant gaps and inconsistencies that cast doubt on its findings. It is situated on the west coast of the Isle of Lewis, an area home to internationally important seabird populations that are already experiencing declines. The application does not provide adequate evidence to confirm that these species will remain unaffected by the project. Critical foraging areas and migratory routes are involved, yet the implications of displacement, collision risk, and habitat loss are not thoroughly examined.

A major contradiction arises from the developer's assertion of no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which indicates that significant harm is anticipated. This inconsistency undermines the credibility of the assessment and suggests that its conclusions lack proper support from the evidence presented. There is insufficient information regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, and the significance of their feeding areas is not fully recognised. Reliance on modelling raises further uncertainty, particularly for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural

responses.

The placement of turbines within a key migratory corridor creates a notable risk by acting as a barrier along a primary flight path for species migrating between the UK and Iceland. The assessment fails to thoroughly evaluate the long-term consequences of sustained mortality in this corridor and the potential effects on species with limited global populations.

Regulatory standards are not met, as 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, along with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation activates the precautionary principle, resulting in an unlawful conclusion regarding consent.

The identified deficiencies also signify non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural resources. The failure to prove that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment lacks reliability due to 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 satisfy the statutory criteria required for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a simplistic perspective, treating heritage merely as a collection of isolated, static features instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static entities, neglecting their continued significance and the impact of development on their surroundings. This mischaracterisation leads to an incomplete assessment of cultural effects and dismisses their importance in community life.

Moreover, the application fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These aspects are crucial to the identity of the area, yet they are entirely omitted from the assessment, indicating a significant oversight. The cultural impact of the development cannot be fully grasped without acknowledging these factors.

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

A critical procedural flaw is the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, hindering lawful determination.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, indicates a clear violation of policy requirements.

Collectively, the disregard for living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to offer a sufficient basis for evaluating the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents, but the full report has not been made public. This omission creates a significant evidential gap and hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's research. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not mere speculation. However, the lack of access to the complete assessment limits scrutiny of the findings and affects the evaluation of their significance in the decision-making process.

The proposal has also been perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given the necessary attention. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application does not provide a full evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, existing evidence suggests negative effects that have not been fully revealed. Without the complete assessment, it cannot be shown that the application complies with this policy.

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

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This limits the ability to make a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal seeks to introduce large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. This installation would establish a continuous industrial presence near the shoreline, leading to a fundamental and irreversible transformation of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to accurately represent the scale of change or the sensitivity of the receiving environment.

The visual impact of the turbines has not been properly conveyed, with the proximity and scale of these structures likely to dominate views from residential areas, historic sites, and popular coastal locations. This dominance would severely affect visual amenity and degrade the essential qualities of naturalness and remoteness. Additionally, there are significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not adequately capture the most sensitive receptors or worst-case scenarios, especially regarding crucial cultural heritage sites and valued landscapes, which may lead to an understatement of the visual impact and compromise the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated entities undermines a comprehensive evaluation of their settings and cultural significance. The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not just a visual concern but also

a broader cultural and spatial harm that the application has not adequately addressed.

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The dominant and unavoidable presence of the turbines, due to their height and proximity, indicates that the resulting change is fundamental and permanent, beyond the realm of acceptable mitigation measures. Collectively, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, rendering the assessment materially deficient. It involves extensive seabed preparation and installation works in a high-energy Atlantic environment, yet no fully developed Construction Environmental Management Plans or Pollution Prevention Plans are provided. Instead, the application relies on future mitigation and contingency measures to be formulated after consent has been granted, which prevents any meaningful evaluation of their potential effectiveness or adequacy.

Particularly alarming is the sensitivity of the West Lewis coastline, which supports clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored. Furthermore, there is a significant degree of uncertainty surrounding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts, which extends to 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 undermines the ability of the competent authority to assess environmental protection measures during the determination process. This introduces procedural risk and raises serious concerns regarding regulatory compliance, as the deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are evaluated before consent is granted; the absence of such information renders a lawful

determination impossible.

Overall, the combination of undefined mitigation measures, insufficient management plans, and uncertainties concerning potential impacts collectively signifies that the assessment is incomplete. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the objection to the application.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is inadequate and lacks a thorough evaluation of ecological and socio-economic impacts. A crucial concern is the assumption that fishing activities can be displaced without consequences. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This gap in information is significant, as such displacement poses risks of overfishing in other areas and could lead to wider economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the impacts on fisheries and local livelihoods is compromised.

Moreover, the proposal presents notable risks to marine species, particularly due to the underwater noise produced during construction activities. High-energy hammer piling, expected to occur over an extended period, could create disturbances across considerable distances, adversely affecting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises substantial concerns; however, the application downplays these effects without adequate supporting evidence.

There is also a discernible inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction casts doubt on the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment overlooks cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders the determination of 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 adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment culminate in an incomplete and unreliable evaluation. These flaws obstruct a thorough understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment lacks any evaluation of these dark skies and their significance. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This change would significantly alter the night-time environment, yet the application fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors.

The omission is particularly concerning given the rising importance of dark skies for the local identity and the emerging sector of astro-tourism. Furthermore, the proposal does not address the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study focused on phototaxis, the application does not adequately consider how the aviation lighting could affect these species or contribute to higher mortality rates.

This failure is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks the nocturnal behaviours and associated risks of the wildlife. For instance, Kittiwakes may forage or migrate at night, making them susceptible to disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific data related to night-time activity creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions are at odds with National Planning Framework 4, which emphasises the need to protect natural places and maintain environmental quality. Additionally, the lack of consideration for night-time character undermines the comprehensive assessment of landscape and seascape impacts.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact

modelling, and species-specific analysis render the application incomplete, failing to support a lawful determination.

TOURISM

The application presents a concerning deficiency in assessing tourism impacts, crucial for the economy of the Isle of Lewis. With tourism significantly reliant on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness, the application acknowledges that 86% of visitors are attracted by the scenery. However, it fails to provide any quantified assessment of how large-scale offshore infrastructure could alter visitor numbers, behaviours, or the economic contributions made by this sector.

Tourism has seen substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this, there is no modelling to examine how the potential industrialisation of the seascape and subsequent loss of environmental quality might affect Tourism Gross Value Added or the overall economic resilience of the area. This lack of analysis renders it impossible to ascertain if the proposed development would result in a net economic benefit or detriment to a crucial and expanding sector.

Furthermore, the assessment neglects to address the critical role that environmental quality plays in tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and burgeoning segment of the local economy.

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, the failure to analyse environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies culminate in a significant evidential gap. This inhibits a thorough evaluation of economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this application. It is marked by critical gaps in baseline data, the continued use of an undefined design envelope, and an overreliance on unspecified mitigation measures. Additionally, important impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impact of both offshore and onshore elements has not been adequately evaluated, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially considerable. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their own findings. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

The proposal would result in 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 relationships, and negative impacts on tourism constitute permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to

invoke the pertinent regulatory provisions to request the submission of the necessary missing information.

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

Additional Comments

I am completely opposed to the proposed N4 offshore wind farm due to what I believe will be major long-lasting negative impacts on the community that I call home. An industrialisation of this size and its proximity to the shore would have significant adverse impact on natural habitation of marine and bird life. There would be a negative impact to the income of many on the west side of Lewis dependant on Tourism. No longer would the island be able to claim the unspoiled beauty of sea and landscape so attractive to our many visitors. I register my objection to a proposal in which I see many causes for concern and no long-lasting benefit to the local community.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: FF19081E

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable account of the potential environmental impacts of the

proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This ambiguity compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect those of the actual development, thus preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the basis that any environmental harm will be addressed later, which obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of vital information to post-consent stages is procedurally unacceptable and undermines the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

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

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is not possible to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the existence of gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The proposal lacks a comprehensive and evidence-based evaluation of alternative options, which is essential under the Environmental Impact Assessment requirements. Instead of offering a logical comparison of feasible alternatives based on their environmental consequences, the application outlines the project's development history without demonstrating that less harmful options have been adequately considered or chosen over more damaging ones.

There is a notable absence of a transparent analysis of different offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely contemplated placing turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impacts, this lack of analysis prevents any assertion that the proposed location is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence indicating that alternative paths have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to present a clear strategy for avoidance and the lack of comparative analysis signal that mitigation through design has not been prioritised, instead relying on post-design mitigation strategies.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This situation reflects a neglect of the established mitigation hierarchy, preventing the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough alternatives assessment, it cannot be determined that the proposal aligns with sustainable or policy-compliant practices.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and the well-being of communities. The failure to provide a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not undergone adequate evaluation and cannot support a lawful decision.

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 ornithological assessment accompanying the application presents significant deficiencies, characterised by evidence gaps and internal contradictions that compromise its findings. The application overlooks the internationally important seabird populations found along the west coast of the Isle of Lewis, many of which are already experiencing declines. Furthermore, it fails to demonstrate, to the necessary evidential standard, that these species will not suffer adverse effects from the proposed development. Key foraging areas and migratory pathways have not been adequately evaluated, particularly regarding displacement, collision risk, and habitat loss.

There exists a critical inconsistency within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. Such a case is only warranted when significant harm is anticipated, raising serious doubts about the credibility of the assessment and suggesting that its conclusions lack the backing of substantial evidence. The assessment also falls short in showing that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling techniques

introduces an element of uncertainty, particularly for species already in decline like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality, especially given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor poses an additional significant risk, creating an obstacle in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with relatively small global populations, have not been sufficiently assessed by the application.

From a regulatory standpoint, the application does not 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, alongside data deficiencies and limitations of modelling, signifies that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and precludes a lawful determination in favour of consent. Additionally, the identified deficiencies reflect non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to establish that internationally important seabird populations will not face adverse impacts places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment neglects to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. It adopts a simplistic approach, viewing heritage merely as a collection of isolated, static assets, rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

Key culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These active places of burial and spiritual practice are mischaracterised as static features, without consideration of their ongoing use and significance, nor the development's impact on their setting. This oversight leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted connection to the coastal environment. These crucial elements of local identity are conspicuously absent

from the evaluation, highlighting a significant deficiency. Without their inclusion, the cultural implications of the development remain poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and disregards established principles of participation in matters affecting cultural and environmental interests.

A critical procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, undermining lawful determination.

From a policy standpoint, these inadequacies directly contradict the National Planning Framework 4, particularly regarding the protection of historic assets and places. The omission of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal is severely lacking in its assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the complete report has not been published. This creates a significant evidential gap, preventing both the public and the competent authority from fully understanding the social risks highlighted in the developer's research.

Summaries suggest that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. However, without access to the full assessment, proper scrutiny of the findings is impossible, limiting the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Yet, these impacts have not been adequately incorporated into the main application or given the necessary weight. By withholding the complete Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

The lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset results in an incomplete evidential basis for evaluating the balance of benefits and harm.

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

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

In conclusion, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This impedes a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

In summary, the assessment falls short in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal does not align with the need to protect this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development presents significant deficiencies in the assessment of construction and pollution risks, which are insufficient for evaluating potential environmental effects. The project entails extensive seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully articulated Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application defers mitigation and contingency measures to a post-consent phase, which impedes any substantial assessment of their adequacy or effectiveness.

This approach is particularly troubling given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to both sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate detail on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated from seabed disruption and cable installation. In the absence of robust modelling and explicit management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these effects. This uncertainty also extends to potential impacts on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and their corresponding mitigation must occur prior to consent; where such information is lacking, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate adherence to 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 inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks and further reinforce the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The application concerning the West Lewis coast lacks a thorough assessment of fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic impacts. This region is home to a rich marine ecosystem alongside an active fishing industry. However, the application does not sufficiently demonstrate how these critical uses and habitats can be preserved or sustained without causing significant disruption.

A critical flaw is the assumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds exist, are accessible, or can endure the additional pressure. This is a crucial oversight, as such displacement poses a risk of overfishing in other areas, potentially leading to broader economic consequences for the local fishing fleet. Without a solid and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. Extended high-

energy hammer piling is expected to cause disturbances that could impact species such as dolphins over considerable distances. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without sufficient evidence to support its claims.

Inconsistencies are evident within the application, where the necessity for licenses to permit harm to European Protected Species is acknowledged, while concurrently, the impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises significant compliance issues with the Habitats Regulations, especially given that some harm is expected to a degree that legally requires authorisation.

Moreover, the assessment neglects to consider cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential 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 existing marine users or mitigate unacceptable impacts on marine biodiversity, which hampers any conclusion that this proposal embodies sustainable development.

Collectively, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough evaluation of the onshore infrastructure, which is critical as it forms part of a singular integrated project alongside the offshore turbines. By assessing these components separately, the proposal adopts a fragmented approach, obscuring the true extent of the environmental and socio-economic repercussions. This is particularly concerning given the onshore elements, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through delicate landscapes. These activities involve excavation through deep peat areas, especially within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. As a result, the application does not deliver a complete assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats,

and local communities remain largely unexamined. Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these vital habitats have been fully assessed or that appropriate measures to avoid harm have been implemented, creating a significant gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, potentially leading to a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not adequately tackle this concern or provide assurance that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with current land use and legal rights. The lack of evidence confirming that the required consents or processes have been initiated casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and demonstrate adequate protections for peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Ultimately, the separation of the project components, the absence of a comprehensive assessment, and the lack of evidential support regarding environmental and land use impacts culminate in an incomplete and unreliable submission, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" across the western horizon. This change would fundamentally alter the night-time environment.

Furthermore, the application fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of residents and visitors. The significance of dark skies to the area's identity and the growth of tourism sectors like astro-tourism underscores the importance of addressing this issue. The absence of an assessment on these impacts leads to a notable deficiency in the overall landscape and environmental evaluation.

More critically, 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 sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, thereby failing to evaluate how aviation lighting might affect these species or

heighten mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this oversight, as it does not account for nocturnal activity or associated risks. Additionally, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a proper 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, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the overall analysis 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 represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The evaluation of tourism impacts is insufficient 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 region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Despite this growth, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience. Without such analyses, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment neglects to recognise the significance of environmental quality in fostering tourism, including the critical role of unspoiled landscapes and dark skies in enhancing visitor experiences. This lack of focus on emerging markets, such as nature-based tourism and astro-tourism, is further exacerbated by the omission of a

Dark Skies Assessment, creating a notable gap in understanding the potential impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not illustrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity of demonstrating net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to fully assess the economic implications of the proposal.

In summary, the combination of inadequate quantification of tourism impacts, neglect of environmental factors influencing visitor behaviour, and disregard for the island's economic dependence results in a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when examined against statutory duties, national policy, and evidential standards. This application reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting the proposal under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

The evidential basis for determining the application is neither complete nor reliable. Significant gaps exist in baseline data, there is an undefined design envelope, mitigation measures remain unspecified, and crucial impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, precluding a comprehensive understanding of likely 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, while the non-disclosure of the full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction to National Planning Framework 4. It fails to demonstrate the protection of biodiversity, natural spaces, and cultural heritage; it does not show that health and wellbeing impacts are acceptable; and it cannot substantiate a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, internally inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

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

When all factors are considered, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, paired with conflicts in policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent based on these grounds or invoke the necessary regulatory provisions to require the submission of the missing information.

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

Additional Comments

I was born and brought up in the Isle of Lewis and still have family living in the island in the community of Ness..

This proposed plan for these islands will destroy the scenery, the communities and the beauty of the whole area not to mention the impact on sea life and bird life. Please do not go ahead with this industrialisation of this wonderful part of the world

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: 04B2E751

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

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 structured and transparent assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable options based on

environmental impacts, it merely recounts the project's evolution. This narrative does not adequately show that less harmful alternatives have been properly identified, evaluated, and preferred over more damaging choices.

There is no evidence-based or transparent comparison of different offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has thoughtfully considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in assessing impacts, highlights that the lack of such analysis prevents any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall assessment, where the evidence presented does not confirm that alternative routes have been sufficiently explored to minimise impacts on sensitive receptors. This includes significant areas such as Barvas Cemetery, which hold cultural and spiritual importance. The absence of a clear avoidance strategy and comparative analysis suggests that design-led mitigation has not been employed, relying instead on measures to mitigate impacts after the design phase.

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

From a policy viewpoint, these shortcomings undermine adherence to National Planning Framework 4, particularly concerning 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, hindering lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the application is significantly flawed, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is insufficient, and the applied methodologies do not adequately capture key factors such as species presence, behaviour, and habitat use. Consequently, the assessment falls short of providing a solid evidential foundation necessary for impact evaluation.

One major shortcoming is the failure to appropriately assess otters, a European Protected Species, in their use of coastal regions for foraging and movement. The application neglects to account for their core foraging range and behavioural

characteristics, which results in a lack of thorough evaluation regarding the potential impacts of construction disturbances, noise, and increased human activity. This oversight directly undermines any assertions made about the absence of significant effects on otters.

Further issues arise in the analysis of basking sharks, where reliance on aerial surveys creates a substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when juxtaposed with established land-based observations that highlight their frequent activity in these waters. The failure to adequately incorporate or consider this data results in an incomplete baseline, thereby diminishing the reliability of the assessment's conclusions.

These methodological shortcomings mean that assertions regarding negligible or non-significant effects are based on unsubstantiated assumptions rather than on sound evidence. The lack of adequate baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

Regulatory compliance is also in question, as the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty generated precludes the exclusion of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Therefore, under these circumstances, granting consent is not legally permissible.

In conclusion, the presence of incomplete baseline data, inadequate methodologies, and unfounded conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a sufficiently solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is critically flawed, exhibiting substantial gaps in evidence and internal contradictions that undermine its findings. This area is home to internationally significant seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be negatively impacted. The development is situated within key foraging areas and migratory routes, yet the assessment does not thoroughly consider 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 simultaneously pursuing a Habitats Regulations derogation case, which is typically necessary only when significant harm is anticipated. This contradiction raises serious doubts about the credibility of the assessment and

suggests that its conclusions lack support from the underlying evidence.

Furthermore, the assessment does not sufficiently establish that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional and significant risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term consequences of sustained mortality in this corridor and its potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Overall, the identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. Such shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The deficiencies in the assessment of cultural heritage and community identity are profound and troubling. It is essential to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application reduces heritage to a collection of isolated and static assets, neglecting their vital social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice, yet they are mischaracterised as mere static features. The assessment fails to account for their ongoing use and significance, nor does it consider the potential impacts of development on their surroundings. This oversight leads to an

incomplete evaluation of cultural effects and disregards the essential role these sites play in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are integral to the area's identity and their absence from the assessment represents a considerable oversight. Without their inclusion, it is impossible to grasp the full cultural impact of the development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity that is recognised as characteristic of Indigenous Peoples. However, the absence of a process for Free, Prior and Informed Consent undermines the legitimacy of the assessment and fails to uphold established principles for participation in decisions that affect cultural and environmental interests.

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

From a policy standpoint, these failures put the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. Ignoring both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application lacks the necessary foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are reportedly experiencing considerable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not mere speculation. However, the absence of the full assessment limits the opportunity for thorough examination of these findings, which is

essential for informed decision-making.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of

such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for 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 proposal poses substantial risks to marine life and the local fishing industry, yet the assessment of fisheries and marine ecosystems is inadequate. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing community. However, the application does not convincingly demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be shifted without adverse effects. The application lacks evidence regarding the availability or

accessibility of alternative fishing grounds that could withstand increased pressure. This absence of information is troubling, as it raises the possibility of overfishing in other areas, potentially leading to broader economic ramifications for the local fishing fleet. Without a thorough, evidence-based evaluation, understanding the impacts on fisheries and associated livelihoods remains elusive.

Additionally, the proposal carries significant risks for marine species, particularly due to the underwater noise resulting from construction activities. Prolonged high-energy hammer piling is expected to cause disturbances over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a notable portion of the local bottlenose dolphin population is a serious concern. Nonetheless, the application minimises the importance of these impacts without adequate supporting evidence.

There is a notable inconsistency in the application where the need for licenses to permit harm to European Protected Species is recognised, while simultaneously, impacts are described as negligible. This contradiction calls into question the reliability of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is anticipated to an extent that necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple factors such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined pressures, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence concerning fishing displacement, the undervaluation of acoustic impacts, and the internal inconsistencies significantly undermine the assessment's credibility. These shortcomings hinder a comprehensive evaluation of the potential consequences for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The project involves significant onshore infrastructure, which has been inadequately assessed, leading to an incomplete understanding of the impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are closely interrelated; however, their separate assessments create a disjointed approach that fails to capture the full scale of environmental and socio-economic effects.

Onshore components include 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 important habitat. The application does not provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively, yet the distinct separation of offshore and onshore components means the overall effects on peatlands, habitats, and communities remain unclear.

There are notable risks to sensitive habitats, including machair systems and peatland environments that receive policy protection. The application fails to illustrate that impacts on these habitats have been fully appraised or that suitable avoidance measures have been enacted, thus creating a significant evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts renewable energy development objectives. The application does not sufficiently address this concern or demonstrate 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 a lack of evidence indicating that the necessary consents or procedures have been initiated, which brings into question the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project as a cohesive entity and to show adequate protection for peatlands, habitats, and land use interests contradicts 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 disjunction between project components, the absence of a comprehensive assessment, and the lack of substantiated evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is distinguished by its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, thereby creating a continuous and intrusive "wall of light"

effect across the western horizon and fundamentally transforming the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This failure is particularly concerning given the vital role that dark skies play in the region's identity and the development of emerging tourism sectors, including astro-tourism. The lack of consideration for these impacts results in a clear deficiency in the overall landscape and environmental assessment.

Moreover, the application does not evaluate the potential impacts on nocturnal wildlife. Certain species, including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that the proposal fails to evaluate how the aviation lighting could affect these species or contribute to increased mortality rates.

The situation is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 with respect to the safeguarding of natural environments and environmental quality. It also weakens the comprehensive assessment of landscape and seascape impacts, given that night-time character is an integral component of the environment.

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

TOURISM

The Isle of Lewis relies heavily on tourism, which has evolved into a vital component of its economy, growing 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 local economy. However, the assessment of tourism impacts related to this application is materially deficient, as

it neglects to evaluate the economic and social consequences for this key sector. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet fails to provide a quantified assessment of how the introduction of large-scale offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment does not consider the crucial role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies in enhancing the visitor experience. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding the impacts on burgeoning markets such as nature-based tourism and astro-tourism.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefits. It conflicts with strategic objectives that identify tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

The cumulative effect of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and overlooking the economic dependency of the island results in a significant evidential gap. This prevents 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 criteria for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application echoes the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains insufficient.

The application lacks a comprehensive and reliable evidential foundation for decision-making. Significant gaps in baseline data persist, accompanied by 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, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These shortcomings 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 conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been adequately conducted, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties and potential risks to the environment. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Moreover, 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 will result in permanent changes that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent on these bases or invoke the relevant regulatory provisions to compel the submission of the necessary missing information.

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

Additional Comments

To Whom It May Concern,

I am writing to formally object to the proposed Spiorad na Mara offshore wind farm off the west coast of the Isle of Lewis.

Let me be clear: this objection is not opposition to renewable energy itself. Scotland absolutely should pursue renewable energy and reduce carbon emissions. However, renewable energy developments must be responsibly located and proportionate to

their surroundings. This proposal fails that test completely.

The scale, proximity, and industrial nature of this development are wholly inappropriate for one of the most environmentally sensitive and visually spectacular coastlines in Scotland.

According to the developer's own information, the proposal could include up to 60 turbines reaching heights of approximately 380 metres - significantly taller than the Eiffel Tower. These structures would not be distant features barely visible on the horizon. The nearest turbines are proposed to sit only around 5–6 km (approximately 3–3.5 miles) from shore. The total project area would cover approximately 161 square kilometres of sea off the west coast of Lewis.

This would fundamentally and permanently alter the character of the coastline.

The west coast of Lewis is internationally valued for its open seascapes, dark skies, wildlife, beaches, peatlands, cultural heritage, and sense of remoteness and wildness. These qualities are not simply aesthetic; they are central to the identity and economy of the Outer Hebrides.

Tourism is one of the most important economic sectors in the islands. Visitors come here specifically because the landscape feels unspoilt, natural, peaceful, and dramatically different from urban or industrial environments. A wall of enormous industrial turbines dominating the horizon would severely undermine the very qualities that attract visitors to Lewis in the first place.

I moved here two years ago and am currently building a family home and holiday accommodation in the area. My investment in this community (financially and personally) was made because of the exceptional environmental quality and natural beauty of this coastline. This proposal directly threatens not only my own future and livelihood, but the wider visitor economy on which many local people depend.

The impact on residents must also not be underestimated. Communities living along this coastline would face the permanent industrialisation of views that have remained largely unchanged for generations. The cumulative psychological and visual impact of turbines of this scale, positioned so close to shore, would be enormous.

There are also major environmental concerns that require far greater scrutiny. The west coast of Lewis supports internationally important marine and bird life, including seabirds, migratory species, marine mammals, and fragile coastal ecosystems. The long-term effects of construction, seabed anchoring, underwater cabling, vessel traffic, operational noise, electromagnetic disturbance, and habitat disruption remain deeply concerning.

One of the most difficult aspects of this proposal to understand is why turbines of this size need to be located so close to shore at all.

Floating offshore wind technology exists specifically to allow developments to be placed further offshore in deeper waters. Other Scottish offshore wind projects have been positioned much further from populated coastlines, in some cases more than

25 km offshore.

If these developments can be placed far enough offshore to reduce visual and environmental impacts elsewhere, why should the communities of Lewis be expected to accept a massive industrial development virtually on their doorstep?

Remote and rural communities should not be treated as sacrifice zones for infrastructure that would never be considered acceptable in more densely populated or economically powerful parts of the country.

This proposal risks:

- * Permanent industrialisation of one of Scotland's most iconic coastal landscapes
- * Significant harm to tourism and local businesses
- * Damage to the wellbeing and quality of life of residents
- * Potential impacts on marine ecosystems and wildlife
- * Loss of the wild, open character of the west coast of Lewis
- * Negative impacts on property values and long-term local investment confidence
- * Setting a dangerous precedent for further large-scale industrial development close to shore

The west coast of Lewis is not an empty space. It is a living community, an internationally valued landscape, a wildlife habitat, and a place people choose to live, visit, and invest in because of its extraordinary natural environment.

Once industrialised on this scale, that landscape cannot be restored.

I therefore strongly urge decision-makers to reject this proposal in its current form and require any future offshore wind developments to be positioned substantially further offshore, where impacts on communities, landscapes, wildlife, and tourism can be meaningfully reduced.

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: 1D0B495B

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is both sensitive and biologically rich, yet the available baseline data is inadequate, and the methodologies employed do not sufficiently document species presence, behaviour, or habitat usage. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their use of coastal areas for foraging and movement. The failure to evaluate their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been sufficiently examined. This gap undermines any assertions regarding a lack of significant effects on this species.

In addition, the assessment of basking sharks is problematic. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The failure to adequately incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions presented.

The limitations in methodology result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and broader ecosystem interactions. This situation raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately

demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the necessary evidential threshold to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory findings, 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 and obstructs a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding the protection of biodiversity and natural assets. The failure to convincingly demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity associated with the proposed development is significantly flawed. It does not acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead, the application adopts a simplistic perspective,

viewing heritage merely as a collection of isolated and unchanging assets. This approach neglects the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

A notable shortcoming is the inadequate consideration of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet the assessment misclassifies them as static elements. It overlooks their current usage and the meaning they hold for the community, as well as the implications that development may have on their surroundings. Such mischaracterisation leads to an incomplete understanding of the cultural effects and fails to account for their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, including aspects such as the Gaelic language and local traditions, nor does it recognise the longstanding relationship between the community and the coastal environment. These factors are crucial to the area's identity but have been completely omitted from the evaluation, representing a significant gap in the assessment. Without incorporating these elements, the true cultural impact of the proposed development remains unclear.

Concerns also arise regarding community rights and engagement, particularly relating to the Gaelic-speaking population, which possesses a distinct cultural identity akin to that of Indigenous Peoples. The failure to conduct a process of Free, Prior and Informed Consent raises serious questions about the validity of the assessment. This lack of meaningful consultation does not align with recognised principles of participation regarding decisions that affect cultural and environmental interests.

A major procedural oversight is the omission 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 consequences for the island community. This alone renders the determination of the application unlawful.

From a policy perspective, these inadequacies position the proposal in direct opposition to the National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, marks a clear deviation from policy stipulations.

Collectively, these failures to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations create a significant evidential void. The cultural impacts of the development have not been thoroughly evaluated, and the application falls short in providing a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment raises serious concerns regarding the social impacts, health, and wellbeing of the community. Although the developer engaged local residents through focus groups, the absence of the full report creates a critical evidential gap that hinders public understanding and the competent authority's evaluation of the identified social risks. This lack of transparency not only undermines public trust but also obstructs proper scrutiny of the findings, which are vital for determining their significance in the decision-making process.

Available summaries show that residents are already experiencing significant stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts, rooted in direct community engagement, are concrete and not speculative. Additionally, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or considered with the seriousness they deserve. Consequently, withholding the full assessment obscures the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. For developments of such magnitude, it is essential to fully understand the social, economic, and health implications, especially when community character and functioning are at risk. The omission of the complete dataset within the application denies a comprehensive evidential basis for balancing potential benefits against the associated harms.

From a policy standpoint, the application fails to comply with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission constitutes a material failure within the application, breaching the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This undermines the potential for a lawful determination and firmly indicates that the application lacks sufficient supporting information.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a series of significant concerns regarding its treatment of onshore infrastructure, which is assessed in isolation from the offshore components of the project. This fragmented approach obscures the true environmental and socio-

economic impacts, as the onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and the required access infrastructure, are intrinsically linked to the offshore turbines.

A critical element of the onshore infrastructure is the excavation across areas of deep peat, particularly in Barvas Moor, which serves as both an ecologically sensitive habitat and a substantial carbon store. The failure to provide a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint, leaving essential questions unanswered.

Moreover, the application does not adequately consider the cumulative effects of separating the assessments for offshore and onshore components. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively. Consequently, the separation prevents a thorough understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, are at risk, and the application falls short in demonstrating that these impacts have been fully assessed or that necessary avoidance measures are in place. This oversight highlights a significant gap in the evidence required for biodiversity protection. Additionally, the disturbance of peatland raises concerns about carbon balance, as released stored carbon could create a carbon debt, undermining the aims of renewable energy initiatives.

There are also serious implications for land use, particularly with the routing of infrastructure through active croft land. The application lacks evidence that it has obtained the necessary consents or initiated appropriate processes, which raises questions about the feasibility and legality of the project.

From a policy standpoint, the failure to evaluate the project as an integrated whole, coupled with the inadequate protection of peatlands, habitats, and land use rights, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation strategies further weakens the application.

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

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

There is no pressing need for further wind power generation off the coast of Scotland. A fraction of the money being spent on the second interconnector to the mainland could be spent on proper sustainable local energy infrastructure for the islands, with added benefits for visitor and learning economy development. This is a proposal for inappropriate industrialisation of a unique and fragile marine and land environment and a cultural genocide.

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: 77A21723

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

Dear Sir/Madam

This representation serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the Environmental Impact Assessment. As a result, the projected impacts may not accurately represent the actual development, which obstructs both public understanding and the competent authority's ability to assess the true environmental effects.

Moreover, the proposal places considerable emphasis on undefined mitigation measures, monitoring strategies, and management plans. This deferral of essential information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime. The regime mandates that likely significant effects and their mitigation be established clearly before determination, and this proposal fails to meet that requirement.

The assessment also suffers from substantial evidential deficiencies, including gaps in baseline data and methodological limitations, leading to the use of assumptions instead of site-specific evidence. This creates uncertainty surrounding the scale and significance of impacts, especially where conclusions about negligible or non-significant effects are drawn without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt, invoking the precautionary principle particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Taken together, these factors—an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data—render the Environmental Impact Assessment Report both unreliable and incomplete. Such deficiencies obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

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

Notably, the assessment neglects to adequately identify and evaluate otters, which are classified as a European Protected Species. The application does not recognise their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to a significant oversight in assessing the potential effects of construction-related disturbances, noise, and increased activity. This omission undermines the conclusions drawn regarding the absence of significant effects on otters.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises serious concerns regarding the adequacy of the ornithological assessment, which is fundamentally flawed, revealing substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated 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 application does not adequately demonstrate that these species will not be adversely affected, as required by the evidential standard.

Within the assessment, there exists a significant contradiction. The developer asserts that 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 casts doubt on the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment fails to sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces a degree of uncertainty, particularly for species facing severe decline, including Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, particularly in situations where baseline data is lacking and the behavioural responses of the species are not comprehensively understood.

The placement of turbines within a designated migratory corridor presents an additional risk, as it effectively creates a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential impacts on species that possess relatively small global populations been considered.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, together with data deficiencies and limitations inherent in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to lawfully support a conclusion in favour of consent.

Moreover, the identified deficiencies represent a breach of the requirements set forth in 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 puts the proposal in direct opposition to national policy.

In summary, the assessment is unreliable owing to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These failings hinder a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed to support a determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is insufficient and does not capture the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not adequately convey the extent of this visual change. Given the scale and closeness of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the level of impact or its importance in relation to such a sensitive landscape.

Concerns arise regarding the choice and presentation of visual viewpoints. There is evidence that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, which affects the assessment's reliability.

Additionally, there is a failure to consider 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 interlinked visually and spatially with the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete analysis 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 understood and their connection to the natural horizon. This constitutes not just a visual impact but also a broader cultural and spatial damage that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which emphasises the need to protect natural areas and historic assets. The degree of change proposed does not align with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy conformity.

It is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resultant change is not something that can be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the view that the proposal conflicts with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in the application is fundamentally inadequate and lacks the necessary detail for a proper evaluation of potential environmental impacts. The proposed works, which involve significant seabed

preparation and installation in a high-energy Atlantic environment, do not come with fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that would be formulated after consent is granted, making it impossible to assess their sufficiency or effectiveness meaningfully.

This dependence on vague future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disruption from sediment and pollution. 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 the prevention, control, or monitoring of such risks.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is 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 been recognised as sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders any meaningful evaluation of whether sufficient safeguards are in place to address pollution events. This introduces procedural risks 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 contravenes the stipulations of the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation measures must be evaluated prior to granting consent, and the absence of this information precludes a lawful determination. Furthermore, the application fails to demonstrate compliance with existing policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts culminate in a materially deficient assessment. These shortcomings 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 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 proposed development introduces permanent red aviation lighting that is visible over long distances, which would create a continuous “wall of light” effect across the

western horizon. This lighting would fundamentally alter the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are a critical aspect of the area's environmental quality, cultural identity, and tourism value, making the lack of assessment regarding their impact a significant oversight in the Environmental Impact Assessment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the growing interest in sectors such as astro-tourism, which rely heavily on the preservation of dark skies. The absence of such an assessment creates a notable gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not incorporate any lighting impact assessment or phototaxis study, and consequently, it fails to address how aviation lighting might affect these vulnerable species or escalate mortality rates.

This deficiency is further exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activities or the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting; however, this potential impact has not been evaluated. The lack of site-specific night-time data results in a critical shortcoming in understanding the ecological consequences.

Without an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to confidently rule out negative consequences cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which advocates for the protection of natural environments and the quality of the landscape. Furthermore, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and

national policy. It echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This application, although presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

There are significant shortcomings in the evidential basis for this application. The absence of complete baseline data and the continued reliance on an undefined design envelope raise serious concerns. Moreover, the unspecified mitigation measures and the lack of consideration for key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—further complicate the assessment. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide a comprehensive Social Impact Assessment represents a significant omission. These shortcomings inhibit the competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. The absence of tourism impact modelling also undermines claims of net economic benefit. A thorough assessment of the cumulative impact from both offshore and onshore elements has not been conducted, leaving uncertainties regarding the effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are lacking in completeness and are inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority refuse consent for the Spiorad na Mara Offshore Wind

Farm application in its entirety or utilise relevant regulatory measures to compel the submission of the necessary information.

Additional Comments

I am totally against this global warming net zero cult, and especially it being foisted upon the people of Lewis

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 5ECF57E2

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a careful examination of the Environmental Impact Assessment Report and accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west coast of the Isle of Lewis, an area noted for its stunning Atlantic coastline, largely untouched environment, and rich cultural heritage. The design, scale, and proximity of the project to the shore raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a conspicuous lack of adequate evidence to support a lawful decision regarding the application. Essential environmental data is absent, with baseline information being both limited and inconsistent, and many critical components of the proposal remain undefined. The implementation of a flexible design framework complicates the understanding of potential significant impacts, while the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community implications, and assertions regarding negligible effects lack robust evidence.

Moreover, there are evident policy inconsistencies. The application appears to contradict the National Marine Plan, the Environmental Impact Assessment process, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural environments, and public health and wellbeing. It does not sufficiently illustrate that the national obligations for safeguarding biodiversity, addressing climate issues, and preserving environmental integrity will be met. These discrepancies are critical to the statutory tests required for consent and compromise the competent authority's capacity to determine the proposal's acceptability in policy terms.

The unprecedented scale of the project, with large turbines placed in close proximity to the coast, raises alarming concerns regarding landscape capacity, visual impact, and overall environmental repercussions. Taken as a whole, the lack of comprehensive information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and cannot support a lawful decision. In light of these issues, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial information and does not offer a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates significant uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not correspond to the actual development that would be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise that environmental harm will be addressed later prevents a meaningful evaluation of these measures' effectiveness or an accurate assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the intentions behind the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps within the report, which include deficiencies in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed. This area is known for its biological

activity, yet the baseline data presented is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of marine species. Consequently, the evaluation lacks a reliable evidential basis for assessing potential impacts.

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

Moreover, the assessment of basking sharks is similarly deficient. The reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The neglect of such critical data further weakens the completeness of the baseline and affects the reliability of the conclusions drawn.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. The evaluation adopts a narrow perspective, viewing heritage merely as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practice; however, they have been classified as static features within the assessment. This mischaracterisation neglects their continued use and meaning, as well as the effects of development on their settings, leading to an incomplete analysis of cultural impacts and overlooking their role in community life.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity and are conspicuously missing from the assessment, constituting a major oversight. The failure to consider these factors inhibits a comprehensive understanding of the development's cultural impact.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity recognised as that of an Indigenous People. However, the absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and disregards established principles for participation in decisions that affect cultural and environmental matters.

A significant procedural error is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic repercussions on the island community. This alone compromises the legality of the determination process.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices represent a clear deviation from the stipulated policy requirements.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory responsibilities culminates in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not offer a sufficient foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. While the developer engaged with local residents through focus groups, the full report remains unpublished, creating a crucial evidential gap. This absence of information obstructs both public understanding and the competent

authority's ability to gauge the extent of social risks identified through the developer's research.

Preliminary summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These issues stem from direct community engagement and are not based on speculation. Nonetheless, the withholding of the complete assessment restricts thorough scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there is recognition that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the appropriate consideration. By not disclosing the entire 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, as a comprehensive understanding of social, economic, and health implications is crucial for developments of this scale. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and potential harm by omitting the full dataset.

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 while minimising harm, yet the available evidence highlights existing adverse effects that remain inadequately disclosed. Without access to the full assessment, demonstrating adherence to this policy is not feasible.

The procedural ramifications are substantial. 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 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, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

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.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern; however, the application fails to adequately address the severity of these effects and lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

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

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

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

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

This proposal would result in extensive and irreversible alterations 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 are permanent effects that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

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

Additional Comments

I do not understand why something so intrusive and disrupting on every level is being built which has no benefit whatsoever to the island . The power created is not designated to be used on Lewis or the Outer Hebrides and is benefitting another country hundreds of miles away. The disruption on Lewis both from an environmental and social perspective cannot be justified. I feel the islands are once again being abused as our voices are not as many or as loud as those in other areas where objections would be more difficult to silence. I strongly object to this development.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AB09F2B0

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 the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal 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. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Additionally, many essential elements of the proposal remain undefined. The adoption of a flexible design framework hampers a clear assessment of likely significant impacts, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidential support.

There are also evident and significant policy contradictions. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not establish that it can meet national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory requirements for consent and compromise the capability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal involves large turbines located in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and 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 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 concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise,

and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fails to adequately consider the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application approaches heritage in a reductive manner, treating it as a collection of isolated and static assets. This perspective ignores the ongoing social, cultural, and spiritual roles these heritage sites play within the community.

Significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features despite being active places for burial and spiritual practice. This oversight fails to recognise their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete, disregarding the integral role these sites have in community life.

Moreover, the application neglects to address intangible cultural heritage, including the Gaelic language and traditions, which are essential to the identity of the area. The absence of these elements from the assessment is a critical omission, as it prevents a comprehensive understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, a vital procedural flaw is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, 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 acknowledge living cultural practices represents a clear violation of policy requirements.

Overall, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not sufficiently justify the potential cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal's impact comprehensively. Without access to the complete dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

Moreover, there is a troubling lack of transparency regarding social impacts, health, and wellbeing associated with the development. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, preventing both the public and the relevant authorities from grasping the full extent of social risks highlighted in the developer's research.

Available summaries reveal that residents are already experiencing notable stress, anxiety, and concern due to the size and proximity of the proposed development. These

impacts are based on direct engagement, thereby affirming their validity rather than relying on speculation. Yet, the failure to release the comprehensive assessment stifles proper scrutiny of these findings and diminishes the capacity to assess their relevance in the decision-making process.

The perception of the proposal as a threat to community identity and cohesion is also evident, with “cultural loss” identified in the developer's own findings. However, these serious impacts have not been adequately considered in the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs tied to this development, thus failing to integrate these critical factors into the overall evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Effective development must foster positive health outcomes while minimising harm. Nevertheless, the existing adverse effects highlighted by the available evidence have not been fully acknowledged. Consequently, without the complete assessment, it cannot be substantiated that the application aligns with this policy.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the evidence of already experienced adverse impacts, renders the evaluation both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to support its approval.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to the incomplete assessment of construction and pollution risks, failing to provide the necessary detail to fully evaluate likely environmental effects. With substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application's reliance on mitigation and contingency measures that are to be prepared post-consent effectively thwarts any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly troubling given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

Additionally, there remains 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 effects of such impacts. This uncertainty also extends to

the potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application undermines the opportunity for evaluating whether the necessary safeguards are in place to adequately respond to pollution events. This procedural risk complicates the assessment by the competent authority concerning environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and necessary mitigation be assessed prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The inadequacy of the assessment regarding fisheries and marine life raises serious concerns about the potential ecological and socio-economic impacts of the proposal. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A critical issue is the unfounded assumption that fishing activities can be displaced without any repercussions. The lack of evidence to show that there are alternative fishing grounds that are accessible and capable of supporting the added pressure is particularly alarming. This gap in information is crucial, as the risk of overfishing in other areas poses potential economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, it becomes impossible to understand the true impacts on fisheries and the livelihoods they support.

The proposal also poses significant risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to cause widespread disturbance, affecting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population raises substantial concerns, yet the application tends to minimise the significance of these effects, lacking sufficient supporting evidence.

Moreover, there is a troubling inconsistency within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and brings into question its compliance with the Habitats Regulations, particularly where harm is expected to the extent that legal authorisation is required.

The assessment does not adequately account for cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains uncertain.

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

In summary, the deficiencies in the evidence related to 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable level of industrialisation was highlighted. This current application, however, is presented under an enhanced policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data raise concerns about the reliability of the evidential basis for determination. The application relies on an undefined design envelope and mitigation measures that are not specified, while also neglecting to address key impact pathways, including those related to nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

Furthermore, this proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural areas, or cultural heritage, nor does it demonstrate that the impacts on health and wellbeing are acceptable. Additionally, there is no evidence of a net economic benefit, as the absence of tourism impact modelling leaves significant uncertainties. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, thereby obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially significant. 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, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent permanent impacts 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 imperative that the competent authority either refuse consent based on these grounds or exercise relevant regulatory provisions to mandate the submission of the necessary missing information.

For these reasons, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 39E9CD85

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 the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal 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. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Additionally, many essential elements of the proposal remain undefined. The adoption of a flexible design framework hampers a clear assessment of likely significant impacts, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the provided documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidential support.

There are also evident and significant policy contradictions. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not establish that it can meet national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory requirements for consent and compromise the capability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal involves large turbines located in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and 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 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 concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise,

and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development fails to adequately consider the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application approaches heritage in a reductive manner, treating it as a collection of isolated and static assets. This perspective ignores the ongoing social, cultural, and spiritual roles these heritage sites play within the community.

Significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features despite being active places for burial and spiritual practice. This oversight fails to recognise their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete, disregarding the integral role these sites have in community life.

Moreover, the application neglects to address intangible cultural heritage, including the Gaelic language and traditions, which are essential to the identity of the area. The absence of these elements from the assessment is a critical omission, as it prevents a comprehensive understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, with characteristics that align with those of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles for participation in decisions that affect cultural and environmental interests.

Furthermore, a vital procedural flaw is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, 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 acknowledge living cultural practices represents a clear violation of policy requirements.

Overall, the neglect of living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not sufficiently justify the potential cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation. This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal's impact comprehensively. Without access to the complete dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

Moreover, there is a troubling lack of transparency regarding social impacts, health, and wellbeing associated with the development. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, preventing both the public and the relevant authorities from grasping the full extent of social risks highlighted in the developer's research.

Available summaries reveal that residents are already experiencing notable stress, anxiety, and concern due to the size and proximity of the proposed development. These

impacts are based on direct engagement, thereby affirming their validity rather than relying on speculation. Yet, the failure to release the comprehensive assessment stifles proper scrutiny of these findings and diminishes the capacity to assess their relevance in the decision-making process.

The perception of the proposal as a threat to community identity and cohesion is also evident, with “cultural loss” identified in the developer's own findings. However, these serious impacts have not been adequately considered in the primary application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs tied to this development, thus failing to integrate these critical factors into the overall evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Effective development must foster positive health outcomes while minimising harm. Nevertheless, the existing adverse effects highlighted by the available evidence have not been fully acknowledged. Consequently, without the complete assessment, it cannot be substantiated that the application aligns with this policy.

In summary, the failure to disclose the full Social Impact Assessment, coupled with the evidence of already experienced adverse impacts, renders the evaluation both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to support its approval.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to the incomplete assessment of construction and pollution risks, failing to provide the necessary detail to fully evaluate likely environmental effects. With substantial seabed preparation and installation works planned in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application's reliance on mitigation and contingency measures that are to be prepared post-consent effectively thwarts any meaningful assessment of their adequacy or effectiveness.

This lack of clarity is particularly troubling given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

Additionally, there remains 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 effects of such impacts. This uncertainty also extends to

the potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application undermines the opportunity for evaluating whether the necessary safeguards are in place to adequately respond to pollution events. This procedural risk complicates the assessment by the competent authority concerning environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and necessary mitigation be assessed prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The inadequacy of the assessment regarding fisheries and marine life raises serious concerns about the potential ecological and socio-economic impacts of the proposal. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A critical issue is the unfounded assumption that fishing activities can be displaced without any repercussions. The lack of evidence to show that there are alternative fishing grounds that are accessible and capable of supporting the added pressure is particularly alarming. This gap in information is crucial, as the risk of overfishing in other areas poses potential economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, it becomes impossible to understand the true impacts on fisheries and the livelihoods they support.

The proposal also poses significant risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to cause widespread disturbance, affecting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population raises substantial concerns, yet the application tends to minimise the significance of these effects, lacking sufficient supporting evidence.

Moreover, there is a troubling inconsistency within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and brings into question its compliance with the Habitats Regulations, particularly where harm is expected to the extent that legal authorisation is required.

The assessment does not adequately account for cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains uncertain.

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

In summary, the deficiencies in the evidence related to 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable level of industrialisation was highlighted. This current application, however, is presented under an enhanced policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data raise concerns about the reliability of the evidential basis for determination. The application relies on an undefined design envelope and mitigation measures that are not specified, while also neglecting to address key impact pathways, including those related to nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

Furthermore, this proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural areas, or cultural heritage, nor does it demonstrate that the impacts on health and wellbeing are acceptable. Additionally, there is no evidence of a net economic benefit, as the absence of tourism impact modelling leaves significant uncertainties. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, thereby obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially significant. 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, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism represent permanent impacts 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 imperative that the competent authority either refuse consent based on these grounds or exercise relevant regulatory provisions to mandate the submission of the necessary missing information.

For these reasons, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 39E9CD85

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in material planning, environmental assessment, cultural considerations, and procedural adherence. Situated off the west coast of the Isle of Lewis, the proposed development occupies an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and a strong cultural identity. Concerns about the scale, proximity, and design of the proposed project call into question its alignment with statutory requirements, national policy directives, and the tenets of sustainable development.

The evidence presented in the application is inadequate for a lawful determination. It lacks critical environmental data, with limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The flexible design framework used complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be properly evaluated. Consequently, the documentation fails to provide a comprehensive understanding of potential environmental, cultural, or community impacts, leaving assertions of negligible or non-significant effects unsupported by credible evidence.

There are notable conflicts with established policy frameworks. The proposal appears to violate provisions of the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory tests necessary for obtaining consent, jeopardising the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal, which includes large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy discrepancies indicates that the application is incomplete and incapable of facilitating a lawful determination. Given these circumstances, it is essential that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the presence of gaps in baseline data render 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 a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The failure to provide a structured and reasoned assessment of alternatives significantly undermines the application. It does not meet the statutory requirements of

the Environmental Impact Assessment regime and presents a narrative of project evolution rather than a detailed comparison of realistic alternatives based on their environmental effects. This shortcoming results in a lack of clarity regarding whether less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, the assessment lacks a transparent and evidence-based comparison of different offshore locations, development scales, and design configurations. The application does not convincingly demonstrate that the developer has adequately considered the possibility of placing turbines further offshore, which could mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the absence of this analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

This inadequacy is also evident in the evaluation of cable routing and landfall, as there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis points to an absence of mitigation by design, relying instead on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal aligns with sustainability or policy compliance.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, especially in relation to the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks comprehensiveness and reliability within the West Lewis coastal environment. This region is known for its biological activity and sensitivity, yet the methodologies employed are inadequate in capturing essential aspects such as species presence, behaviour, and habitat use. Consequently, the baseline data is incomplete, failing to provide a solid foundation for assessing potential impacts.

One significant oversight is the failure to properly evaluate otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their usage of coastal areas for foraging and movement. As a result, the assessment

overlooks the core foraging range and behavioural patterns of otters, leaving the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This gap in analysis undermines the conclusions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally unreliable, exhibiting internal inconsistencies and substantial gaps in evidence that compromise its conclusions. Seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing declines, are internationally important. However, the application fails to sufficiently demonstrate, in line with evidential standards, that these species will not face adverse effects. This development is situated within critical foraging areas and migratory routes, yet the implications of potential displacement, collision risk, and habitat loss are inadequately evaluated.

A significant contradiction is evident, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only relevant when substantial harm is anticipated. This inconsistency raises serious questions about the credibility of the assessment and

suggests that its conclusions are not backed by the necessary evidence. The assessment neglects to provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently recognised, and reliance on modelling techniques introduces additional uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in critical decline. The methodologies employed may underestimate mortality rates, especially given the lack of comprehensive baseline data and a limited understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor presents a further significant risk, acting as a barrier along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences of increased 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 required evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling challenges, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, rendering a lawful conclusion in support of consent impossible.

Moreover, the identified deficiencies signify a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will remain unscathed places the proposal in direct opposition to national policy. Collectively, these issues of internal inconsistency, methodological flaws, and lack of evidence impede a robust evaluation of impacts, leading to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking. It does not recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. Instead, the application simplifies heritage by viewing it as a collection of isolated and static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

One significant issue is the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are treated as unchanging features in the assessment. This approach neglects their continued use and significance, as well as the effects of development on their surroundings. Such misrepresentation leads to an incomplete understanding of cultural impacts and fails to acknowledge their importance to community life.

Moreover, the assessment does not address intangible aspects of cultural heritage,

including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but have been entirely omitted from the evaluation, creating a major gap. Without these considerations, the cultural impact of the development remains inadequately understood.

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

A significant procedural flaw is the failure to carry out a compliant Island Communities Impact Assessment, which is required 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 hinders a lawful determination.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, diverges from policy requirements.

Overall, the inadequate assessment of living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural effects of the development have not been thoroughly evaluated, and the application fails to provide a solid foundation for determining the true cultural costs associated with the proposal.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is lacking in completeness and fails to provide the necessary detail to evaluate potential environmental effects adequately. The proposal entails extensive seabed preparation and installation operations within a high-energy Atlantic setting, yet it lacks 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 hinders any thorough evaluation of their sufficiency or effectiveness.

This dependence on unspecified future actions raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. Although the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. In the absence of reliable modelling and clearly defined management approaches, it remains impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to 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 until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent is issued, and without this critical information, a lawful determination cannot occur. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of fisheries and marine life, failing to provide a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these crucial habitats and uses, which raises serious concerns regarding potential disruptions.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. There is a lack of evidence within the application regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate this displacement. This crucial omission poses risks of overfishing in other areas, which may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and livelihoods.

Moreover, the proposal poses considerable risks to marine species, notably through the underwater noise associated with construction activities. The anticipated high-

energy hammer piling over an extended duration is expected to create disturbances that may affect marine life over large distances, particularly species such as dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population raises pressing concerns. Nevertheless, the application appears to minimise the significance of these impacts without providing sufficient supporting evidence.

There exists a contradiction within the application itself, where the necessity of licences to permit harm to European Protected Species is acknowledged, yet impacts are concurrently characterised as negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm is of a nature that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these cumulative effects obscures the overall impact on marine ecosystems and socio-economic conditions, hindering a proper understanding of the implications involved.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby undermining any assertion that it constitutes sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a crucial aspect of the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment and represents a significant concern.

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

More importantly, there is no evaluation of the potential impacts on nocturnal wildlife.

Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The lack of a lighting impact assessment or phototaxis study means the application fails to consider how aviation lighting might affect these species or contribute to increased mortality rates.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. It shares significant issues with the 2008 Lewis Wind Power proposal, which was rejected due to unacceptable industrialisation. Now, it is put forward under a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis. There are serious gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are clear procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland)

Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

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

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

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

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

Additional Comments

This windfarm is too big and will have massive adverse effects on marine life, wildlife and the environment including the night sky.

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: 5DBA1251

