

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is based on a review of the Environmental Impact Assessment Report and related documents, highlighting various deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information presented is limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework used impedes a clear understanding of likely significant effects. Additionally, reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a full understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent and weaken the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns, especially with large turbines positioned close to the shoreline, which impacts landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must be applied in these circumstances.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete. It does not provide a full or transparent account of the likely environmental effects of the proposal. The application relies on a flexible Project Design Envelope, which does not commit to specific turbine dimensions or layouts. This introduces significant uncertainty and prevents a consistent worst-case scenario application. As a result, the impacts presented may not accurately reflect the development that is ultimately constructed. This lack of clarity stops both the public and the competent authority from understanding the true extent of environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the basis that environmental harm will be addressed at a later stage makes it impossible to meaningfully evaluate effectiveness or assess residual impacts. This deferral of key information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are established before determination.

There are also serious evidential deficiencies, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for 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 undefined design envelope, absence of specified mitigation, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and robust assessment of environmental effects, meaning the competent authority is not able to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide a full understanding of the ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the baseline data remains inadequate. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species in this marine system. Consequently, the assessment does not establish a solid evidential basis for impact

evaluation.

A significant shortcoming is the omission of otters, which are a European Protected Species. The application does not adequately recognise their active foraging and movement within coastal areas. By neglecting their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been properly assessed. This lack of assessment undermines conclusions regarding the absence of significant effects on otters.

The assessment of basking sharks also exhibits deficiencies, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This approach likely leads to an underestimation of their presence, especially when compared to established land-based observations indicating frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The insufficient baseline data limits the ability to meaningfully assess 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 comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. Therefore, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a robust evaluation of the impacts on marine ecology and protected species and highlight that the application does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings regarding the ornithological assessment, which is fundamentally flawed due to evident 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. Yet, the application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within vital foraging areas and migratory pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A key contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This

inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment does not sufficiently prove 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 adequately accounted for, and the reliance on modelling approaches introduces uncertainty, particularly for species in serious decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly where baseline data is lacking and behavioural responses remain poorly understood.

The positioning of turbines within a recognised migratory corridor represents an additional and considerable risk, creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold needed to ascertain no adverse effect on the integrity of protected sites. The existence of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This necessitates the application of the precautionary principle, which hinders a lawful conclusion in favour of consent.

These identified deficiencies also reflect 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.

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and inadequate evidence. These failings obstruct a comprehensive evaluation of impacts and culminate in the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected. The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the island community. Its absence alone renders a lawful determination impossible.

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

The overall result is a significant evidential gap due to the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations. The cultural impacts of the development have not been adequately evaluated, and the application lacks sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not adequately portray the sensitivity of the receiving environment or the scale of change involved. The coastline of West Lewis is characterised by an expansive Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated close to the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to properly convey the magnitude of visual change associated with the turbines. Their scale and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the visual impact has been underestimated, thereby compromising the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Key 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 treats these cultural assets in isolation rather than acknowledging their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual impact but a wider cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historical assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a comprehensive worst-case scenario analysis further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application

acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information precludes a lawful determination. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a glaring oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which is visible over long distances, threatens to create an intrusive “wall of light” effect that would fundamentally alter the night-time environment.

There has been no evaluation of how this lighting might impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the critical role dark skies play in the region's identity and the growth of sectors such as astro-tourism. The absence of consideration for these impacts represents a significant gap in the overall landscape and environmental assessment.

Furthermore, the application neglects to evaluate the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are

particularly susceptible to the effects of artificial lighting, which can lead to disorientation and a heightened risk of collision. The lack of a lighting impact assessment or a phototaxis study means there is no examination of how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it fails to account for nocturnal activity and the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of night-time data specific to the site creates a critical gap in understanding the ecological implications.

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

From a policy standpoint, the failure to assess these elements contradicts the guidelines set out in the National Planning Framework 4 concerning the protection of natural places and the preservation of environmental quality. This oversight also diminishes the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a crucial aspect of the overall ecosystem.

In summary, the omission of assessments related to dark skies and nocturnal wildlife reveals 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 economic impact of tourism on the Isle of Lewis is paramount, with the sector having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Given this substantial contribution, it is crucial to understand how the proposed large-scale offshore infrastructure would affect visitor numbers, behaviour, and the overall economic contribution to the region. The application recognises that 86% of visitors are attracted by the area's scenic beauty, yet it lacks a comprehensive assessment of how the industrialisation of the seascape and a potential decline in environmental quality would impact Tourism Gross Value Added and the resilience of the local economy.

Moreover, the assessment does not adequately consider the vital role that environmental quality plays in tourism. The significance of unspoiled landscapes and dark skies is essential for enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in the understanding of impacts on a burgeoning segment of the local economy.

In addition, the failure to evaluate tourism impacts poses broader consequences for an island community characterised by limited economic diversification. This oversight has implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly addressed, in violation of the requirements set forth in the Islands (Scotland) Act 2018.

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

Overall, the lack of a quantifiable analysis of tourism impacts, the failure to consider the environmental factors influencing visitor behaviour, and the neglect of the island's economic dependency culminate in a substantial evidential gap. This deficiency precludes a thorough evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory responsibilities, national policy, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, however, is being assessed within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis provided for determination. There are notable deficiencies in baseline data, an ambiguous design envelope, and reliance on unspecified mitigation measures. Moreover, it overlooks significant impact pathways, including nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to offer a comprehensive understanding of likely significant effects or residual impacts.

There are pronounced procedural deficiencies as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does

not sufficiently demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks, which may be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and barring a lawful conclusion that impacts are acceptable.

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

Overall, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise the appropriate regulatory provisions to demand the submission of the missing information.

In light of the aforementioned issues, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

An absolute disgrace that this is being considered here. What a waste of money and effort to have a wind farm so far away from where the power will be used and to destroy such a huge area for 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: F9AA347C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A comprehensive review of the Environmental Impact Assessment Report and accompanying documentation has highlighted significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. Situated off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns regarding the development's compatibility with statutory obligations, national policy, and sustainable development principles arise due to its scale, proximity to the shoreline, and design features.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. Furthermore, the use of a flexible design framework obfuscates the understanding of potential significant effects, while the dependence on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed evaluation of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are evident and substantial conflicts with policy requirements. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national standards for protecting biodiversity, climate considerations, and environmental integrity. These policy conflicts directly impact the statutory tests essential for consent and jeopardise the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal, with large turbines placed in proximity to the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a comprehensive, transparent account of the likely environmental impacts of the proposal. The flexible Project Design Envelope approach, which does not commit to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario and undermines the assessment's integrity, preventing both the public and the relevant authorities from fully understanding the true environmental implications of the development.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured comparison of realistic alternatives, which is crucial under the Environmental Impact Assessment regime. Instead, it offers a narrative about the project's development that does not adequately identify or assess less harmful options in favour of more damaging solutions. This inadequacy is evident

in the absence of a transparent, evidence-based comparison of alternative offshore locations, scales of development, or design configurations. Notably, the developer has not adequately considered placing turbines further offshore, where the impacts on visual aesthetics, ecology, and the coastline could potentially be less severe. The significance of the West Lewis coastline, particularly concerning proximity to shore, underscores the need for such analysis to determine whether the proposed siting is indeed the least damaging option.

Moreover, the deficiencies extend to the cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies a failure to apply mitigation by design, relying instead on post-design measures that may not adequately address the environmental concerns at hand.

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

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission that leads to the conclusion that the application has not undergone adequate scrutiny and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis represents a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, providing an incomplete and unreliable understanding of ecological receptors. The methodologies employed do not adequately capture important aspects such as species presence, behaviour, and habitat use. Consequently, the assessment fails to provide a sound evidential basis for evaluating impacts.

One significant oversight is the treatment of otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed. Such shortcomings undermine any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals significant deficiencies, particularly due to the reliance on aerial surveys that introduce detection bias, especially in Atlantic conditions. This methodological approach likely underestimates the presence of basking sharks when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate relevant data results in an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological limitations lead to conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The absence of sufficient baseline data further prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and wider ecosystem interactions. This creates uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The level of uncertainty introduced does not allow for 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 makes the assessment unreliable. These deficiencies prevent a robust evaluation of impacts on marine ecology and protected species, contributing to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to establish to the required evidential standard that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. This development is situated within key foraging areas and migratory pathways; however, the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the underlying evidence. Moreover, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully addressed, and the reliance on modelling methods introduces uncertainty, particularly for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate

mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

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

From a regulatory standpoint, the application does not meet 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 gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle and precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is markedly deficient, as it overlooks the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interwoven. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the handling of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices; however, the assessment treats them merely as static features, failing to account for their continued usage and the implications of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects, disregarding their importance to community life.

Moreover, the application neglects to examine intangible cultural heritage, which includes the Gaelic language, local traditions, and the historical bond between the community and the coastal landscape. These aspects are crucial to the area's identity

but are entirely omitted from the assessment, constituting a significant oversight. Without addressing these elements, the cultural ramifications of the development remain inadequately understood.

Concerns extend to community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity, recognised as having characteristics of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been initiated. The lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters concerning cultural and environmental interests.

Another critical procedural lapse is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone precludes a lawful determination.

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

In sum, the neglect to evaluate living heritage, intangible cultural significance, community rights, and statutory duties creates a substantial evidential gap. The cultural impacts of the development have not been adequately considered, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks identified through the developer's own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative, yet the failure to disclose the complete assessment hinders proper scrutiny and limits understanding of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion. The developer's findings identify "cultural loss," but these impacts have not been adequately integrated into the main application or given appropriate consideration. This withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, particularly when community character and functioning are at stake. The application does not provide the complete dataset necessary for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development projects must promote positive health outcomes and avoid harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, there is no way to confirm compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot perform a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material failure within the application and does not satisfy the evidential requirements set out by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The proposal to introduce large-scale turbines near the shoreline poses a significant risk of transforming this landscape into an industrial setting, fundamentally altering its character and resulting in a permanent and irreversible change. The assessment of seascape, landscape, and visual impacts associated with this application is severely deficient, failing to accurately reflect both the scale of change and the sensitivity of the receiving environment.

There is an inadequate representation of the visual impact stemming from the turbines' size and proximity to residential areas, historic sites, and popular coastal locations. This is likely to dominate views, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment neglects to convey the significance of these impacts within such a sensitive landscape context.

Furthermore, there are methodological flaws in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. This raises concerns about the potential understatement of visual impacts, which undermines the overall reliability of the assessment.

The evaluation also fails to account for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, with visual and spatial relationships that connect them to the Atlantic horizon. The application treats these heritage assets as isolated rather than recognising their interdependence, leading to an incomplete analysis of the impact on their setting and cultural importance.

Industrialisation of the seascape would disrupt these relationships, altering the experience of heritage assets and their connection to the natural horizon. This is not merely a visual issue but represents a broader cultural and spatial harm that has not been adequately assessed.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of change proposed is incompatible with the necessary safeguarding of landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy requirements.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence will be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through any proposed mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities within a dynamic Atlantic environment. However, the assessment of construction and pollution risks is lacking in completeness and fails to provide the necessary detail for evaluating the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The application instead leans on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

The absence of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application inhibits the assessment of whether sufficient safeguards exist to address potential pollution events. This procedural risk undermines the capacity of the competent authority to evaluate environmental protection measures at the time of determination.

Moreover, there are considerable uncertainties concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Robust modelling and clearly defined management strategies are necessary to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

The application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills but lacks sufficient detail on the preventative, control, or monitoring measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination, highlighting the sensitivity of the receiving environment.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be assessed before consent is granted, and without such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the combined lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These issues hinder a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application is fraught with significant deficiencies that directly impact marine ecosystems and local fishing industries. There is an alarming lack of a thorough evaluation regarding the ecological and socio-economic impacts on the diverse marine life and active fishing operations off the West Lewis coast. The assumption that fishing activities can be displaced without repercussions is particularly concerning. No evidence is presented to indicate the availability or accessibility of alternative fishing grounds, nor is there any indication that these grounds could support the additional fishing pressure, raising the risk of overfishing elsewhere and jeopardising the local fleet's economic stability.

Moreover, the proposal poses considerable risks to marine species, especially from the underwater noise created during construction. The anticipated high-energy hammer piling is likely to cause extensive disturbance, potentially affecting a significant portion of the local bottlenose dolphin population. Despite the gravity of these predictions, the application downplays the severity of such impacts, lacking sufficient supporting evidence.

Additionally, the application contains an internal inconsistency that warrants immediate scrutiny. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as

negligible. This contradiction not only undermines the credibility of the entire assessment but also raises serious questions about compliance with the Habitats Regulations, particularly when anticipated harm demands legal authorisation.

The failure to assess cumulative impacts is another critical shortfall. The assessment does not adequately consider the combined effects of habitat disturbance, noise pollution, and the displacement of fishing activities. This omission severely hampers the ability to ascertain the overall implications for marine ecosystems and the socio-economic conditions of the area.

From a policy perspective, there is a clear non-compliance with both the National Planning Framework 4 and the National Marine Plan. The application does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus undermining the conclusion of sustainable development.

In summary, the myriad of deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on fisheries and marine life, necessitating immediate action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure related to the project is fundamentally lacking and does not adequately address the full range of impacts arising from this integrated initiative. The connection between the offshore turbines and the onshore works is essential; however, their separate evaluations lead to a fragmented understanding of the environmental and socio-economic consequences.

Onshore elements involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and associated access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is both a significant carbon store and an ecologically sensitive area. The failure to provide a comprehensive assessment of these impacts limits understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered in conjunction; however, the division between offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, sensitive habitats, including machair systems and peatland environments, face considerable risks, and these areas are subject to policy protections. The application lacks evidence that the impacts on these habitats have been thoroughly

evaluated or that suitable avoidance measures have been implemented, highlighting a significant gap in the protection of biodiversity.

Concerns also arise regarding the carbon balance, as disturbances to peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance is positive.

Additionally, routing infrastructure through active croft land raises possible conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or processes have been initiated, which calls into question the feasibility and lawful execution of the project.

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

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application that prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment. Dark skies are a crucial aspect of the West Lewis coastline, contributing to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that is visible over extensive distances, creating a continuous "wall of light" effect across the western horizon, which would fundamentally disrupt the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the critical importance of dark skies to the area's identity and the potential development of sectors like astro-tourism, this omission becomes even more significant. Consequently, there exists a notable deficiency in the overall landscape and environmental assessment.

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

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

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

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

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

TOURISM

The assessment of tourism impacts within the application is fundamentally inadequate, neglecting to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. The success of tourism is intricately linked to the area's wild coastline, near-pristine landscapes, dark skies, and a prevailing sense of remoteness. Notably, the application acknowledges that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions derived from tourism.

This sector has experienced substantial growth, with its value rising from £65 million in 2017 to over £81.5 million, thereby supporting in excess of 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not model the potential impacts of industrialisation on the seascape or the anticipated decline in environmental quality on Tourism Gross Value Added or broader economic resilience. As a result, it remains unclear whether the proposed development would yield a net economic benefit or detract from an established and thriving industry.

Furthermore, the assessment neglects to address the significance of environmental quality in enhancing the tourism experience, particularly highlighting the crucial role of unspoiled landscapes and dark skies in attracting visitors. The absence of a Dark Skies Assessment exacerbates this inadequacy, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local

economy, notably nature-based tourism and astro-tourism.

In light of the island community's limited economic diversification, the failure to assess tourism impacts carries broader implications for local employment, businesses, and overall community sustainability. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the requisite to establish a net benefit. It stands in opposition to strategic objectives that deem tourism a priority growth sector, lacking the necessary evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminate in a significant evidential shortfall. This deficiency hinders a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as evaluated against statutory duties, national policy, and evidential standards. This application mirrors the primary issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A complete and reliable evidential basis for determination is lacking within the application. Significant gaps exist in the baseline data, along with an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hampering a full understanding of likely significant effects or residual impacts.

Procedural failures are evident, particularly 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 shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, as it does not demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to prove 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 impacts of offshore and onshore elements have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

A massive industrial wind farm will have an adverse affect on every community on the island. Not enough research has gone into the extent of its impact in either the short term or the impossible-to-predict long term on either the offshore or the onshore works . I live on the outskirts of Stornoway in an area where there is already severe pressure on land use and services. Our communities cannot absorb a huge workforce: we do not have adequate health, education, leisure, commercial and social services for our existing needs, not to mention travel and transportation problems.

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: 0D065F9C

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 regimes. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental impact, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, particularly in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is missing critical environmental data, and the baseline information presented is limited and inconsistent, leaving key aspects of the proposal undefined. The flexible design framework employed creates uncertainty regarding potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Furthermore, there are substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These policy discrepancies directly relate to the statutory tests required for consent and jeopardise the ability of the competent authority to determine that the development adheres to acceptable policy standards.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact, with large turbines positioned alarmingly close to the shoreline. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In such circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of project evolution that does not

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

There is a clear absence of transparent comparison regarding alternative offshore sites, development scales, and design configurations. The application notably does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely diminish. The West Lewis coastline's sensitivity and the importance of proximity to shore in assessing impact render this lack of analysis particularly concerning, as it prevents any conclusions that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence provided is insufficient to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes significant cultural and spiritual sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been considered, leading to a reliance on post-design mitigation measures instead.

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, obstructing the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency raises serious concerns regarding adherence to National Planning Framework 4, especially in terms of protecting natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is significantly inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for assessing impacts.

One crucial shortcoming involves otters, classified as a European Protected Species. The application neglects to appropriately recognise and evaluate their active use of coastal regions for foraging and movement. The failure to consider their core foraging ranges and behavioural patterns results in an inadequate assessment of potential

impacts from construction disturbances, noise, and increased activity. This gap undermines any assertions regarding the absence of significant effects on otters.

In addition, the evaluation of basking sharks is flawed; reliance on aerial surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The oversight in incorporating relevant data culminates in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data also hampers a meaningful assessment of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it does not correctly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application does not possess a sufficient 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 evaluation of the application reveals significant shortcomings in addressing cultural heritage and community identity, particularly in relation to the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. The assessment adopts a narrow view, treating heritage merely as isolated and static features, rather than recognising their ongoing social, cultural, and spiritual importance to the community.

A major flaw in the assessment is the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are mischaracterised as static elements, overlooking their continued relevance and the potential impacts of development on their surroundings. This inadequate portrayal leads to a superficial evaluation of cultural

effects and neglects their vital role in community life.

Moreover, the assessment fails to acknowledge intangible cultural heritage aspects, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are crucial to the area's identity but are entirely omitted from the evaluation, leading to a critical gap in understanding the cultural impact of the development.

Concerns about community rights and engagement also arise, particularly given that the Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples. The absence of a Free, Prior and Informed Consent process undermines the validity of the assessment and fails to adhere to recognised principles for participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic implications for the island community. This omission prevents any lawful determination regarding the development.

From a policy standpoint, these inadequacies directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear violation of established policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, resulting in an insufficient basis for understanding the true cultural cost of the project.

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. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the full scope of social risks identified in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due to the size and proximity of the proposed development. These reactions stem from direct engagement with the community and are therefore rooted in reality, not speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, which limits the assessment 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" highlighted in the developer's findings. Despite these identified impacts, they have not been adequately reflected in the application nor given appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for projects of this magnitude, especially when community character and function may be at stake. By not presenting the complete dataset, the application lacks a solid evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm, yet the evidence available points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural implications are profound. The competent authority cannot perform a comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with the evidence of current adverse impacts, makes the assessment incomplete and unreliable. This prevents a lawful determination and highlights that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoilt open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, they would establish a continuous and overpowering industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the scale of visual changes that would occur. The size and close proximity of the turbines are such that they would overshadow views from residential areas, historic sites, and popular coastal locations. This situation would directly impact visual amenity, diminishing the intrinsic qualities of naturalness and remoteness that define the area. The assessment does not adequately express the severity of this impact or its significance within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This oversight raises the possibility that the magnitude of visual impact has been minimised, thereby undermining the reliability of the assessment process.

Another critical gap is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. 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 treats these cultural assets as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these important relationships, altering how heritage assets are experienced and disrupting their ties to the natural horizon. This scenario presents not merely a visual impact but a wider cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly in its aim to protect natural places and historic assets. The magnitude of change proposed is at odds with the imperative to safeguard landscape character, visual amenity, and the context 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 both dominant and unavoidable. Consequently, the resulting changes would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These 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 proposal for construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. It involves significant 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 mitigation and contingency measures to be established 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 accidental chemical or oil spills, it does not offer sufficient detail on how these risks will be prevented, controlled, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes 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 effects of these impacts. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and the absence of this information means a lawful determination cannot be reached. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a strong assessment of the ecological or socio-economic impacts related to these important resources. It fails to show how both fishing activities and marine habitats can be protected without significant disruption.

A major concern is the assumption that fishing activities can be moved without any negative consequences. The application lacks evidence indicating that other fishing grounds are available, accessible, or able to support the additional pressure. This gap in information is critical because displacing fishing efforts risks overfishing in other areas, which could lead to broader economic impacts on the local fishing fleet. Without a clear, evidence-based evaluation, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to underwater noise created during construction. The use of high-energy hammer piling for extended periods is expected to disturb species across large distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling, yet the application downplays these impacts without sufficient evidence to back this assessment.

There is also an inconsistency within the application regarding the need for licenses to allow harm to European Protected Species. While it acknowledges that such harm might occur, it simultaneously describes these impacts as negligible. This contradiction calls the credibility of the assessment into question and raises issues about compliance with the Habitats Regulations, especially when harm is anticipated to an extent that would require legal permission.

Additionally, the assessment neglects to take into account the cumulative impacts that come from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to gauge 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 prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This failure prevents any conclusion that the proposal constitutes sustainable development.

In summary, the application's shortcomings—including a lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal contradictions—render its assessment incomplete and unreliable. These issues hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and the related onshore infrastructure is significantly incomplete, resulting in a failure to recognise the full extent of impacts arising from what constitutes a single integrated project. The onshore components, which encompass cabling across protected moorland and the construction of a substation near Stornoway, are fundamentally interconnected with the offshore elements. By treating these components separately, a fragmented approach is adopted that obscures the true scale of the environmental and socio-economic effects involved.

Excavation works are planned across areas of deep peat, particularly in Barvas Moor, an ecologically sensitive habitat and notable carbon store. The application lacks a comprehensive assessment of the impacts associated with these onshore activities, thereby preventing a complete understanding of the project's overall environmental footprint. Additionally, the exclusion or deferral of assessment regarding onshore

impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively; the failure to do so means the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not satisfactorily demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This indicates a significant evidential gap concerning biodiversity protection.

Concerns also arise relating to carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or provide evidence that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land brings potential conflicts with existing land use and legal rights. The lack of evidence that the requisite consents or processes have been initiated raises doubts regarding the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application for development lacks a thorough assessment of both dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will create a continuous "wall of light" that will disrupt the natural night-time environment across the western horizon.

There is no evaluation of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and in promoting emerging sectors such as astro-tourism. The failure to assess these impacts represents a clear omission in the overall assessment of the landscape and environment.

Moreover, the application does not include any analysis of the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly vulnerable to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means there is no consideration of how the aviation lighting might endanger these species or contribute to higher mortality rates.

Compounding this issue is the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Kittiwakes, for example, may be active at night while foraging or migrating, making them susceptible to disorientation from artificial lighting. The lack of site-specific data for night-time increases the uncertainty regarding ecological impacts.

Without a proper evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might be negatively impacted. The necessary standard of evidence to confidently rule out adverse effects is not met, thus invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4, which focuses on the protection of natural areas and environmental quality. It further detracts from the overall assessment of the impacts on landscape and seascape, since the character of night-time is an essential aspect of the environment.

Ultimately, the lack of an assessment regarding dark skies and nocturnal wildlife represents a serious gap in evidence. The absence of baseline data, impact modelling, and species-specific evaluations leaves the application incomplete and unable to support a lawful determination.

TOURISM

The application lacks a thorough assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism is crucially reliant on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the proposal fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the economic contribution overall.

Significantly, tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application does not evaluate how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would generate a net economic benefit or threaten a well-established and expanding sector.

Moreover, the assessment does not take into account the importance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies for visitor experience. This oversight is particularly relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a notable gap in understanding its effects on a recognized and growing part of the local economy.

In an island community that faces limited economic diversification, the omission of tourism impact assessments has broader ramifications 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 duly considered, 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 need to prove net benefit. It also contradicts strategic objectives that prioritise tourism as a key growth sector and does not provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the lack of a quantified analysis of tourism impacts, the failure to assess the environmental factors that drive visitor behaviour, and the disregard for the island's economic dependency lead to a significant evidential gap. This situation hinders a robust evaluation of economic effects and supports 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: 0B54936D

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 basis for this objection stems from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The location of the proposed development off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline and near-pristine environment, as well as its strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which raises questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical issue with the application is the lack of adequate evidential support for a lawful determination. Missing environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a clear understanding of the likely significant effects. The flexible design framework employed does not provide clarity, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to enable a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Moreover, there are substantial conflicts with policy. The proposal appears 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 adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, undermining the competent authority's ability to assess the development as acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. It lacks a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead providing a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, the absence of a transparent, evidence-based comparison of alternative offshore locations, development scales, and design configurations raises serious concerns. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The West Lewis coastline's sensitivity and the critical role of proximity to shore in assessing impact make this lack of analysis particularly detrimental. Consequently, it is impossible to determine that the proposed siting is indeed the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than applying mitigation by design.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive alternatives assessment, it cannot be claimed that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that further substantiates the conclusion that the application has not been adequately evaluated, thus failing to support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity surrounding the proposed development is severely lacking. It fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community intertwine. Instead, the application takes a simplified view, treating heritage as a collection of static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses culturally significant sites such as

the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet they are portrayed as static features, overlooking their current usage and the development's impact on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

The application also disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions. These components are essential to the identity of the area, yet they are notably absent from the assessment, marking a significant oversight. Without evaluating these factors, it becomes impossible to fully grasp the cultural implications of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to comply with established participation principles for decisions affecting cultural and environmental interests.

A critical procedural gap exists due to the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to hinder a lawful determination.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a significant departure from policy requirements.

Overall, the inadequacies in assessing living heritage, intangible cultural value, community rights, and legal obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application fails to offer a solid foundation for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the landscape, seascape, and cultural heritage is profoundly inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The proposed large-scale turbines situated near the shoreline would impose a continuous industrial presence, fundamentally altering the character of the area and resulting in a permanent and irreversible transformation of the landscape.

This application does not accurately depict the scale of the visual change that would occur. The turbines would dominate views from residential areas, historic sites, and

popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the severity of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which compromises the credibility of the assessment.

Additionally, the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage is a serious shortcoming. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment neglects this interdependence, treating these assets as isolated, which results in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal 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 comprehensive worst-case assessment further challenges any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be a dominant and unavoidable feature. The resulting change is, therefore, fundamental and permanent, not something that can be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and emphasise that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application does not adequately protect these vital resources from significant disruption. A critical concern is the presumption that fishing activities can simply be moved without repercussions. The proposal lacks evidence regarding the availability and accessibility of alternative fishing grounds capable of

absorbing the additional pressure, which raises serious concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. Without a thorough assessment grounded in evidence, the effects on local fisheries and livelihoods cannot be fully understood.

Moreover, there are considerable risks posed to marine species, particularly due to the underwater noise resulting from construction activities. The use of high-energy hammer piling over extended periods is expected to disturb marine life across significant distances, notably impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application significantly downplays these effects without adequate supporting evidence.

The application reveals an inconsistency by acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously asserting that such impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially when harm is anticipated to a level that necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to gauge the overall implications 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 illustrate how the proposed development can coexist with existing marine users or avoid adverse effects on marine biodiversity, which precludes any assertion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is incomplete and does not consider the full range of impacts associated with this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure in sensitive landscapes. These activities involve excavating deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to

provide a thorough assessment of these impacts, which hampers understanding of the project's total environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly neglects to assess the impact of permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting is visible over long distances and would fundamentally alter the night-time environment of the West Lewis coastline, an area characterised by exceptionally dark skies that contribute to its environmental quality, cultural identity, and tourism value. The failure to evaluate these impacts on visual amenity, landscape character, or the experiences of residents and visitors is a major oversight, especially given the growing importance of dark skies to the area's identity and sectors such as astro-tourism.

Furthermore, there is a glaring omission in the assessment of impacts on nocturnal

wildlife, particularly species that are sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are at risk of disorientation and increased collision due to phototaxis, yet the application fails to include any lighting impact assessment or phototaxis study, leaving a crucial gap in understanding how aviation lighting may affect these species and increase mortality rates. The reliance on daytime survey data for the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been considered.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites may be adversely affected. The application does not meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecological framework. The absence of any assessment of dark skies and nocturnal wildlife culminates in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The application presents a significant evidential gap regarding the assessment of tourism impacts, which is crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and the prevailing sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced remarkable 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 neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences. This oversight extends to the failure to include a Dark Skies

Assessment, creating a substantial void in understanding the implications for an acknowledged and developing aspect of the local economy, such as nature-based tourism and astro-tourism.

Given the limited economic diversification in this island community, the neglect in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity of showcasing net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development in relation to statutory duties, national policy, and evidential requirements. This proposal echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented with a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

There are major deficiencies in the evidential basis necessary for determination. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, are omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

The application also exhibits clear procedural deficiencies. A compliant Island Communities Impact Assessment is lacking, which breaches the statutory obligations set forth in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of a complete Social Impact Assessment is a material omission. Such failings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In terms of policy compliance, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural spaces, and cultural heritage. Health and wellbeing impacts are not demonstrated as acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements is insufficient, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but, in some areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and rendering a lawful conclusion regarding the acceptability of impacts impossible.

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

When considered as a whole, the application is both procedurally and substantively unfit for determination. The extent of information gaps, alongside policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or utilise the relevant regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

I have deep concerns about the impact this will have for the local community, we have the highest rate of fuel poverty in the British isles yet this is so close to our shores that it will undoubtedly affect tourism and wildlife, not benefiting the local community but detracting from it.

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: ED2C76D2

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. A review of the Environmental Impact Assessment Report and associated documentation has revealed material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential foundation for a lawful determination. Significant environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain unspecified. The application's flexible design framework hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are evident and serious policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national mandates aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies directly relate to the statutory tests necessary for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this location, featuring large turbines situated in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability as a measure of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive commitments regarding turbine dimensions, layouts, or configurations, generates considerable uncertainty. This situation precludes a consistent application of a worst-case scenario analysis and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that will be constructed, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contravenes the fundamental aims of the Environmental Impact Assessment framework, which necessitates that significant effects and their mitigations are clearly defined prior to any determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential standards mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to the National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of concrete mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report not only unreliable but also incomplete. These significant deficiencies impede a lawful and comprehensive assessment of environmental effects, leaving the competent authority without the necessary information to properly evaluate the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to an incomplete and unreliable

understanding of ecological receptors. This area, known for its biological activity and sensitivity, is not adequately represented by the baseline data provided. The methodologies employed fail to effectively capture the presence, behaviour, and habitat utilisation of crucial species. Consequently, the assessment falls short of offering a solid evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a species protected under European law, which are not sufficiently acknowledged in their use of coastal regions for foraging and movement. The assessment does not adequately consider their core foraging range and behavioural patterns. This oversight raises concerns about the evaluation of potential construction disturbances, noise, and increased activity, leaving the conclusions regarding the absence of significant effects on otters unsubstantiated.

Additionally, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduce considerable detection bias, especially in the prevailing Atlantic conditions. This method is likely to underestimate the presence of these sharks compared to established land-based observations that reveal frequent utilisation of the waters. Such omissions lead to an incomplete baseline and compromise the reliability of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and evaluate protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the assessment's unreliability stems from incomplete baseline data, inadequate methodologies, and unsupported conclusions. These critical flaws 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 west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the ornithological assessment associated with the application is significantly flawed, presenting serious gaps in evidence and internal contradictions that undermine its findings. The development is sited within crucial foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the risks of displacement, collision, or habitat loss for these

species.

The application presents a fundamental contradiction, stating that there are no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that its conclusions lack proper support from the available evidence. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the significance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses remain poorly understood.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor, along with potential impacts on species with limited global populations, are not sufficiently assessed in the application.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and modelling constraints indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and collectively affirm that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application takes a reductive approach, viewing heritage as isolated and static rather than dynamic and socially significant.

The treatment of important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, highlights a significant deficiency. These cemeteries serve as active places of

burial and spiritual practice, yet the assessment treats them as fixed features. It overlooks their ongoing use and the development's impact on their surroundings, leading to an incomplete evaluation of cultural effects and neglecting their importance in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and the traditions that reflect the community's long-standing relationship with the coastal environment. These aspects are essential to the area's identity, yet they are notably absent from the evaluation, indicating a critical omission that hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity that aligns with Indigenous characteristics, has not been included in a Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the assessment's credibility and disregards established participation principles in decisions affecting cultural and environmental interests.

Moreover, a vital procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as indicated by available summaries.

These impacts stem from direct engagement and thus are based on factual evidence rather than speculation. Nonetheless, the failure to release the full assessment limits scrutiny of the findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer’s findings. Despite these serious implications, they have not been adequately considered in the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency has broader implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health effects is crucial for developments of this magnitude, especially where community character and functioning may be disrupted. The absence of the complete dataset means that the application does not provide a comprehensive evidential basis for weighing the benefits against the harms involved.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm, yet the evidence presented indicates existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

The procedural consequences are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material oversight in the application and a failure to fulfill the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts does not adequately reflect the significant changes that would occur, nor does it consider the sensitivity of the environment. The proposed large-scale turbines, situated in close proximity to the shoreline, would create a continuous and dominant industrial presence that fundamentally alters the character of the landscape, leading to a permanent and irreversible transformation.

Furthermore, the application does not sufficiently represent the magnitude of the visual changes that would arise. Due to their scale and proximity, the turbines would

dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and erode the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within the context of such a sensitive landscape.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This introduces the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these heritage assets in isolation, the assessment fails to recognise 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 vital relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial harm that has not been adequately addressed in the application.

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, lacking the necessary detail to thoroughly evaluate the likely

environmental effects. It entails extensive seabed preparation and installation work in a high-energy Atlantic environment, yet fails to include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans on mitigation and contingency measures that would be formulated after consent, thereby obstructing any meaningful assessment of their potential adequacy or effectiveness.

This approach raises serious concerns given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it falls short in outlining how these risks will be prevented, controlled, or monitored effectively.

Moreover, uncertainties regarding the scale and behaviour of sediment plumes created by seabed disturbance and cable installation further complicate matters. In the absence of rigorous modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty also extends to potential effects on marine species and habitats that are already recognised as sensitive in the broader context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are established to address pollution events. This procedural risk undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and the necessary mitigation measures must be evaluated prior to consent, and without this information, a lawful determination is not feasible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and prevailing uncertainties regarding potential impacts culminate in a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking, failing to encompass the comprehensive impacts associated with this singular integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are evaluated in isolation, leading to a disjointed approach that obscures the magnitude of the environmental and socio-economic consequences.

Key onshore elements involve cabling across protected moorland, the construction of a

substation in proximity to Stornoway, and the necessary access infrastructure across delicate landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is vital as a significant carbon store and an ecologically sensitive habitat. The proposal does not provide an exhaustive assessment of these impacts, obstructing a complete understanding of the project's environmental footprint.

By neglecting to assess the onshore impacts or postponing their evaluation, the application obstructs an accurate analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the fragmentation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to illustrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance strategies have been implemented, leading to a substantial evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence that the requisite consents or procedures have been commenced, which brings the deliverability and lawful execution of the project into question.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that can be seen from long distances, creating a

continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important due to the value of dark skies for the local identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts represents a clear gap in the overall assessment of the landscape and environment.

More importantly, there has been no evaluation of how nocturnal wildlife will be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application fails to include any assessment of lighting impacts or a phototaxis study, and thus does not address how aviation lighting may affect these species or raise mortality rates.

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

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts, as the night-time character is a vital part of the environment.

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

TOURISM

The proposal under review significantly lacks a thorough assessment of tourism impacts, which are crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are fundamental to the tourism sector. While the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure could affect visitor numbers, behaviour, or the overall economic contribution to the local economy.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential impacts of seascape industrialisation and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without such an assessment, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise this established and expanding sector.

The application also overlooks the critical role of environmental quality in supporting tourism, particularly regarding unspoiled landscapes and dark skies, which enhance the visitor experience and foster emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, creating a significant gap in understanding the potential impacts on a sector that is recognised as increasingly important to the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the obligation to show a net benefit. It conflicts with strategic objectives that position tourism as a priority growth sector and lacks the necessary evidence for the competent authority to accurately assess the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and considering the economic dependencies of the island culminate in a significant evidential gap. This deficiency hinders a robust evaluation of the potential economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Presenting the proposal under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify these concerns.

There are significant deficiencies in the evidential basis provided for the application.

Critical gaps exist in baseline data, the design envelope remains undefined, reliance on unspecified mitigation measures is evident, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material 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.

This proposal is in direct opposition to National Planning Framework 4, failing to demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks tourism impact modelling to evidence a net economic benefit. Furthermore, the cumulative impact of both offshore and onshore components has not been properly assessed, which obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies in parts. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or utilise the relevant regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 243378A2

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation reveals several material deficiencies across planning, environmental, cultural, and procedural aspects. The project is located off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of this proposal, alongside its proximity to the shoreline, raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful determination. Important environmental data is absent, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The application employs a flexible design framework that obscures an understanding of the likely significant effects, and the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust supporting evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment process, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and public health. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly impact the statutory tests needed for consent, undermining the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal introduces large turbines situated near the shoreline, creating significant concerns related to landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential shortcomings, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a complete, transparent, and dependable account of the potential environmental effects of the proposed development. The absence of fixed turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, thus undermining the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the actual development, limiting both public understanding and the competent authority's awareness of the true environmental consequences.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be mitigated at a later stage compromises the ability to conduct a thorough evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is not procedurally acceptable and contradicts the principles of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly defined prior to any determination.

Significant evidential deficiencies are also present, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. This results in uncertainty surrounding the scale and significance of the impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, lack of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives and fails to meet the statutory requirements of the Environmental Impact Assessment. Instead of providing a

structured comparison of realistic alternatives based on environmental effects, it offers a narrative about the project's evolution. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a lack of transparent and evidence-based comparisons of various offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impact highlight the need for this analysis, which is currently absent.

The deficiencies also affect cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been considered, relying instead on post-design measures.

Due to these shortcomings, the application does not demonstrate that environmental harm has been minimised through the selection of site, layout, and infrastructure routing. This indicates a failure to follow the established mitigation hierarchy, which prevents the competent authority from determining if less harmful and more suitable alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, providing an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This marine system is both sensitive and biologically active, yet the baseline data is lacking, and the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant oversight is the treatment of otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. This gap undermines any claims regarding the lack of significant effects on this species.

The assessment also reveals shortcomings in evaluating basking sharks, with heavy reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This method likely underrepresents their presence when compared to established land-based observations, which show frequent use of these waters. Not incorporating or accurately considering such data results in an incomplete baseline, reducing the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than solid evidence. Additionally, insufficient baseline data hampers meaningful assessments 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 does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty undermines the ability to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment is fundamentally flawed, characterised by significant evidence gaps and internal inconsistencies that jeopardise its conclusions. The development site lies within key foraging areas and migratory pathways for seabirds, particularly along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Yet, the application fails to provide the evidential standard required to demonstrate that these species will not be adversely affected.

A crucial contradiction arises in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency undermines the credibility of the assessment, indicating that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not adequately demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling methodologies introduces uncertainty, especially concerning species facing severe declines like Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor poses an additional significant risk, as it effectively creates a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. There is an insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thwarting a lawful conclusion in favour of consent.

Moreover, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction to national policy. Collectively, these weaknesses render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline must be recognised as a living cultural landscape, where environment, language, tradition, and community are closely intertwined. Unfortunately, the assessment provided in the application is fundamentally inadequate, as it adopts a reductive approach that treats cultural heritage as isolated, static assets rather than acknowledging their ongoing 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 sites are active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the impact of development on their setting leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage elements, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These factors are central to the area's identity, yet they are entirely absent from the assessment, representing a significant omission that impedes a proper understanding of the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been

afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect the established principles of 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. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, making it impossible to make a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to recognise living cultural practices, represents a clear departure from policy requirements.

In conclusion, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This deficiency in transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude. The decision-making process requires a

complete evidential basis to assess the balance between the benefits and potential harms of the proposal.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts in the application is significantly lacking and does not fully capture the extent of the changes or the sensitivity of the environment it would affect. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposal to introduce large-scale turbines near the shoreline would create an overwhelming industrial presence, leading to a permanent and irreversible alteration of this landscape.

The assessment fails to adequately depict the scale of the visual change expected from the turbines, which would dominate views from residential areas, historic locations, and popular coastal spots. This would severely impact visual amenity, detracting from the area's naturalness and sense of remoteness. Such shortcomings in the evaluation overlook the significant implications of these impacts on a landscape known for its sensitivity.

Concerns also arise regarding the methodologies used to choose and present visual viewpoints. There is evidence that these viewpoints may not encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the actual visual impact has been underestimated, thereby questioning the reliability of the overall assessment.

Another notable deficiency is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape context, defined by visual and spatial relationships with the Atlantic horizon. By treating

these sites as isolated entities, the assessment fails to recognise their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural value.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the environment in which heritage sites are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but a deeper cultural and spatial disturbance that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, especially concerning the safeguarding of natural landscapes and historic assets. The level of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the contexts of culturally significant sites. The failure to provide a comprehensive worst-case assessment further undermines any assertions of compliance with relevant policies.

Furthermore, 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. Consequently, the changes envisaged would be fundamental and permanent, rendering the possibility of acceptable mitigation illusory.

In summary, the assessment does not accurately reflect the magnitude of the impacts, the environment's sensitivity, or the intrinsic connections between landscape and heritage. These deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposed development is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant shortcomings regarding the assessment of construction and pollution risks, which are crucial for understanding likely environmental effects. It includes extensive seabed preparation and installation works within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. The application instead depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, but it fails to supply sufficient detail on how these will be prevented, controlled, or monitored effectively.

Uncertainty also surrounds 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 further extends 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 is granted, the application obstructs any evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent; the absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts render the assessment materially deficient. These weaknesses inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, rendering the evaluation incomplete and unreliable. The proposal introduces substantial risks to marine species, particularly due to the high-energy hammer piling that would generate underwater noise over an extended period. This activity is likely to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to downplay these effects, failing to provide sufficient evidence to support this minimisation.

A primary concern is the assumption made within the application that fishing activities can simply be displaced without any repercussions. It does not provide evidence that alternative fishing grounds exist, are accessible, or can support the resulting pressure from displacement. This is a critical oversight, as such displacement may lead to overfishing in other areas and could have wider economic implications for the local fishing fleet. Without a solid, evidence-based assessment, it is impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the assessment neglects to consider the cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is crucial, as it

is necessary to ascertain the overall impact on marine ecosystems and socio-economic conditions.

There is also an inconsistency within the application regarding the need for licences to permit harm to European Protected Species. While the potential for harm is acknowledged, the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns about compliance with the Habitats Regulations, particularly in instances where harm necessitates legal authorisation.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies collectively hinder a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project fails to provide a complete assessment of onshore infrastructure, which results in an incomplete understanding of the impacts associated with what is a single integrated project. It is essential to recognise that the offshore turbines and the onshore works are intrinsically linked; however, they are assessed separately, creating a fragmented approach that obscures the true scale of the environmental and socio-economic effects.

Onshore elements of the project include cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and an ecologically sensitive habitat. The application does not present a comprehensive assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

Moreover, by excluding or deferring the assessment of onshore impacts, the application limits the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, yet the disconnection between the offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which receive policy protection. The application fails to demonstrate that the impacts on these habitats have been adequately assessed or that

suitable avoidance measures have been implemented. This omission creates a significant evidential gap concerning biodiversity protection.

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

From a policy standpoint, the failure to assess the project as a whole and to demonstrate adequate 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 undermines the application's reliability.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the environmental quality, cultural identity, and tourism value of the area. However, the Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a serious omission. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly concerning considering the significance of dark skies to the area's identity and the potential for emerging tourism sectors like astro-tourism. The failure to consider these factors results in a notable gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of how the lighting would 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 elevate the risk of collisions. The application does not include a lighting impact assessment or a study on phototaxis, meaning that it fails to evaluate the potential effects of aviation lighting on these species and their mortality rates.

This issue is worsened by the dependence on daytime survey data in the ornithological assessment, which does not consider nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time

data creates a significant gap in understanding the ecological implications.

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

From a policy standpoint, the absence of such assessments contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is integral to the environment.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both

offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would inflict substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism will result in permanent changes that cannot be sufficiently mitigated.

In summation, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, alongside conflicts with policy 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 appropriate regulatory provisions to mandate the submission of the requisite missing information.

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

Additional Comments

Hi, I visit every year surfing. I would not visit this Barvas area to surf with any eyesore or change to the wind (windsurfing) anymore. I was also looking to move there one day as a last frontier of unspoiled territory.

I invest in Wind Power personally and believe it in. There are other places easier to build and where there are no people. Or further out to sea.

Regards,

[Redacted]

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: FF59FC13

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a review of the Environmental Impact Assessment Report and supporting documents, highlighting notable deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and significant cultural heritage. Concerns arise regarding the proposal's scale, proximity, and design in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are gaps in critical environmental data, while baseline information is both limited and inconsistent. Additionally, essential elements of the proposal remain unspecified. The application employs a flexible design framework, which obscures the understanding of potential significant effects. The reliance on yet-to-be-defined mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Substantial conflicts with policy are apparent. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and well-being. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development aligns with policy expectations.

The unprecedented scale of the proposal poses significant challenges in this location, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent evaluation of the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the effective application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that is ultimately realised, leading to a situation where both the public and the competent authority are left unaware of the true extent of the environmental effects.

A concerning aspect of the application is its heavy dependence on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be managed later, which severely limits any thorough evaluation of the measures' effectiveness and assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated before any decision is made.

Moreover, there are considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that fails to meet statutory requirements.

As a result of these deficiencies, the application does not satisfy the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, which does not satisfy the requirements of the Environmental Impact Assessment regime. Instead of offering a detailed and reasoned comparison of realistic alternatives based on their environmental impacts, it provides a narrative of the project's development. This method does not prove that less damaging options have been effectively identified, assessed, and chosen over more harmful solutions.

Furthermore, there is no clear or evidence-based examination of alternative offshore sites, development sizes, or design configurations. Specifically, the application does not show that the developer has seriously considered placing turbines further from the shore, where the visual, ecological, and coastal effects would likely be less severe. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of this analysis means that there is no basis for concluding that the proposed site is the least damaging option.

The shortcomings also apply to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or lessen impacts on sensitive sites. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis suggest that mitigation through design has not been utilised, relying instead on measures that would be implemented after the design phase.

Consequently, the application does not prove that environmental harm has been reduced through proper site selection, layout, and routing of infrastructure. This indicates a disregard for the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives might be available. Without a comprehensive evaluation of alternatives, it is impossible to determine if the proposal is sustainable or meets policy requirements.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly in terms of safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that leads to the conclusion that the application has not been thoroughly examined and cannot be lawfully approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably inadequate and fails to offer a complete or reliable understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidential support for evaluating impacts.

A critical oversight pertains to otters, a species protected under European law, as the

application inadequately acknowledges and assesses their active use of coastal areas for foraging and movement. The lack of examination of their core foraging range and behavioural patterns leads to an inadequate assessment of potential effects stemming from construction disturbances, noise, and increased activity. This gap undermines any conclusions regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. Such an approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The degree of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the assessment's deficiencies, characterized by incomplete baseline data, flawed methodologies, and unsupported conclusions, render it unreliable. These issues obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A fundamental contradiction exists in the application, where the developer claims there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is typically necessary only if significant harm is anticipated. This

inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the evidence presented. Furthermore, there is insufficient evidence regarding the potential impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the significance of these feeding grounds, and the use of modelling approaches introduces additional uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor creates a significant risk by effectively constructing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application has not properly assessed the long-term implications of sustained mortality in this corridor or the potential effects on species that have relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent.

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

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

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

The proposal is viewed as a threat to community identity and cohesion, with indications of "cultural loss" highlighted in the developer's own findings. Nevertheless, these

adverse impacts have not been adequately integrated into the main application, which is a serious oversight. The non-disclosure of the comprehensive Social Impact Assessment obscures the true human and social costs associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development poses serious shortcomings in its evaluation of seascape, landscape, and visual impacts. It does not sufficiently capture the extent of change or the delicate nature of the surrounding environment. The character of the West Lewis coastline is marked by its expansive Atlantic horizon, its undeveloped landscape, and a profound sense of remoteness. The addition of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character and results in a permanent transformation of the landscape.

Moreover, the application fails to adequately reflect the magnitude of the visual changes that would occur. 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 qualities that define naturalness and remoteness. The assessment lacks a proper depiction of this impact and its significance in light of the landscape's sensitivity.

There are significant methodological issues concerning the selection and presentation

of visual viewpoints. Evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding culturally important sites and high-value landscapes. This leads to the risk of underestimating the magnitude of visual impacts, which undermines the assessment's credibility.

Additionally, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, united by visual and spatial relationships with the Atlantic horizon. Treating these heritage assets in isolation overlooks their interdependence, leading to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their links to the natural horizon. This represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal is at odds with the National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The scale of the proposed changes is incompatible with the imperative to protect landscape character, visual amenity, and the integrity of culturally significant sites. The lack of a rigorous worst-case assessment further calls into question any assertions of policy compliance.

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

In summary, the assessment falls short in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on vague future actions raises serious concerns due to the sensitivity of

the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it does not offer adequate details on how these risks will be mitigated, controlled, or monitored.

Furthermore, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and clearly delineated management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting

species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal constitutes sustainable development.

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

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 does not include an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that will be visible from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This will fundamentally change the night-time environment.

There is no evaluation of the lighting's impact on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important because dark skies are crucial to the area's identity and are becoming increasingly relevant to tourism sectors like astro-tourism. The lack of consideration for these impacts represents a clear gap in the environmental and landscape assessment.

Moreover, the application fails to assess the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can lead to disorientation and a

higher risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality remain unexamined.

The reliance on daytime survey data within the ornithological assessment is a further issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites will be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved. This engages the precautionary principle and hinders a lawful determination.

From a policy perspective, the absence of this assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also affects the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

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

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

Moreover, the assessment neglects to address the significance of environmental quality in bolstering tourism. The unspoiled landscapes and dark skies are crucial to visitor experiences, particularly for emerging markets such as nature-based tourism

and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in the understanding of impacts on a recognised and expanding segment of the local economy.

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in meeting the principles of sustainable development as established by statutory obligations, national policy, and necessary evidential standards. It revisits core issues that were the basis for the refusal of the Lewis Wind Power proposal in 2008, where the extent 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, still fails to adequately address these concerns.

A comprehensive and reliable evidential foundation for determination is notably lacking in the application. There are critical deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address key impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Moreover, the application reveals clear procedural deficiencies. The lack of a compliant Island Communities Impact Assessment represents a failure to adhere to the statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission, which obstructs the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These failings are sufficient to render the application unsuitable for determination.

The proposal directly conflicts with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it 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 both offshore and onshore elements has not been properly assessed, thereby obscuring the 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 either incomplete or internally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or utilise 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 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: 48091808

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, revealing 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 identity. The scale of the proposal, alongside the positioning and design of the turbines, presents serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis required for lawful approval. Key environmental data is absent, baseline information is insufficient and inconsistent, and numerous aspects of the proposal remain undefined. The flexible design framework complicates the ability to ascertain likely significant effects, and 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, and the claims of negligible or non-significant effects are not substantiated by robust evidence.

The proposal exhibits clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory tests necessary for consent, diminishing the competent authority's capacity to determine that the development meets policy acceptability.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency to accurately convey the potential environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This uncertainty undermines the integrity of the assessment, as the impacts outlined may not correspond to the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are currently undefined. Seeking consent based on the promise of addressing environmental harm at a later stage hampers the ability to assess the effectiveness of these measures or evaluate residual impacts. This deferral of crucial information to post-consent stages is not only procedurally unacceptable but also contradicts the fundamental objectives of the Environmental Impact Assessment process, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been fully assessed or that suitable safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data fundamentally undermines the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species exhibits significant deficiencies that undermine the reliability of its findings concerning ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the data provided is incomplete.

The methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species, resulting in an absence of a sound evidential basis for evaluating potential impacts.

One critical shortfall in the assessment is the failure to adequately acknowledge and evaluate the active use of coastal areas by otters, a species protected under European law, for both foraging and movement. This oversight neglects to consider their core foraging range and behavioural patterns, thus failing to assess the potential effects of construction-related disturbance, noise, and increased activity. This oversight compromises the validity of any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further methodological shortcomings. The reliance on aerial surveys is problematic, as it introduces considerable detection bias, particularly under the conditions typical of the Atlantic. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent utilisation of these waters. The neglect to incorporate or properly evaluate such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects that are founded on assumptions rather than robust evidence. The lack of sufficient baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. Consequently, there is considerable uncertainty surrounding the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements outlined within the Environmental Impact Assessment regime and the National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the lawful grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that weaken its conclusions. The assessment fails to adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis,

many of which are already in decline, will not be adversely affected by the proposed development. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not robustly evaluated.

A notable inconsistency arises within the application, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and highlights that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment inadequately addresses the potential impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies employed are prone to underestimating mortality rates, especially when baseline data is incomplete and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds further risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality within this corridor or the potential repercussions for species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. Such deficiencies prevent a thorough evaluation of impacts and lead to 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 is significantly flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. Here, environment, language, tradition, and community are deeply intertwined. The application takes a simplistic view, treating heritage as a collection of separate, unchanging assets instead of understanding their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in how the assessment handles culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries are active burial grounds and sites of spiritual practice, yet they are classified as static features. This approach neglects their continued use and the potential impacts of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of the cultural implications and overlooks their vital role in community life.

Moreover, the assessment does not account for intangible cultural heritage, such as the Gaelic language, local traditions, and the community's enduring connection to the coastal environment. These aspects are fundamental to the area's identity but are completely omitted from the analysis, indicating a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population has a distinct cultural identity, reflecting characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles for participation in decisions that impact cultural and environmental matters.

Additionally, there is a notable procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic consequences for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a stark deviation from policy expectations.

Overall, the disregard for living heritage, intangible cultural value, community rights, and statutory responsibilities results in a significant lack of evidence. The cultural impacts of the proposed development have not been appropriately assessed, and the application fails to provide a robust basis for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is critical and has severe implications for the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This failure to disclose vital information creates a significant evidential gap, preventing both the public and the

competent authority from understanding the complete range of social risks highlighted by the developer's own research.

Available summaries show that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are not based on speculation. However, the lack of access to the full assessment hinders proper scrutiny of these findings, limiting the capacity to assess their importance in the decision-making process.

Moreover, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with findings pointing to a potential "cultural loss." Yet, these impacts have not been adequately incorporated into the primary application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency severely undermines the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health implications for developments of this magnitude, especially when community character and function may be at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application is unable to demonstrate its compliance with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and mitigate harm, yet the evidence currently available suggests existing adverse effects that remain undisclosed. In light of the absence of the complete assessment, compliance with this policy is unprovable.

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

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks adequate supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts associated with the proposed development is significantly lacking and does not sufficiently account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, its undeveloped nature, and a

pronounced sense of remoteness. The introduction of large-scale turbines situated near the shoreline would lead to a continuous and overpowering industrial presence, fundamentally changing this character and resulting in a permanent and irreversible alteration of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may fail to adequately represent the most sensitive receptors or extreme scenarios, particularly in connection with key cultural heritage sites and areas of high landscape value. This raises concerns that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integrated into a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and leading to an incomplete analysis of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these vital connections, changing the environment in which heritage assets are perceived and disrupting their relationship with the natural horizon. This presents not only a visual impact but also a deeper cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the preservation of natural areas and historic assets. The extent of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case scenario assessment further undermines any assertions of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a dominant and unavoidable presence. Consequently, the resulting changes are fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and

heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, which is particularly troubling given the environmental sensitivity of the West Lewis coastline. This area is known for its clean coastal waters and significant habitats, which are at risk from sediment disturbance and potential contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide comprehensive information on how these risks will be prevented, controlled, or monitored.

The proposal entails considerable seabed preparation and installation activities in a challenging Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified mitigation and contingency measures that would only be formulated after consent is granted. This deferral is concerning, as it hampers any meaningful evaluation of the adequacy and effectiveness of these measures.

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

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs any assessment of whether sufficient safeguards will be in place to manage pollution events. This not only introduces procedural risks but also undermines the authority's capability to evaluate environmental protection measures at the time of determination.

From a regulatory viewpoint, the omission of vital environmental safeguards is in direct conflict with the stipulations of the Environmental Impact Assessment regime. Assessments of likely significant effects and required mitigations must occur prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short in demonstrating compliance with policies that pertain to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainties regarding potential impacts collectively render the assessment significantly deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application in question does not sufficiently evaluate the ecological or socio-economic impacts associated with these vital resources. It fails to convincingly demonstrate that existing habitats and fishing activities can be protected or maintained without facing significant disruption.

A critical flaw within the application is its assumption that fishing activities can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds are available or that they can handle the additional pressure resulting from such displacement. This lack of information is particularly concerning, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a detailed and evidence-based assessment inhibits a proper understanding of the potential impacts on both fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over vast areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application seems to downplay these effects without adequate supporting evidence.

There are also inconsistencies within the application itself, particularly regarding the necessity for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially in scenarios where harm is predicted to a degree necessitating legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A lack of thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions cannot be determined effectively.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not sufficiently prove that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment collectively render it incomplete and unreliable. This results in an inability to conduct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly neglects the assessment of dark skies and nocturnal wildlife, which is a serious gap in the Environmental Impact Assessment. The West Lewis coastline is defined by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting might impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the value of dark skies to the local identity and the emerging sectors of tourism like astro-tourism. The lack of consideration for these effects results in a clear deficiency in the overall landscape and environmental assessment.

Moreover, the impacts on nocturnal wildlife are not addressed. Species including 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 lacks any assessment of lighting impacts or studies on phototaxis, meaning it does not evaluate how aviation lighting could affect these species or contribute to mortality rates.

This issue is compounded by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and their associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The absence of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

Without proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may face adverse impacts. The required evidential standard to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, 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 the quality of the environment. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is a vital aspect of the environment.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and inadequate for supporting a lawful determination.

TOURISM

The assessment of tourism impacts within the application is notably inadequate and neglects to address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine

landscapes, dark skies, and a profound sense of remoteness. The application itself acknowledges that 86% of visitors are attracted by the scenery, yet it lacks a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution to the region.

The significance of tourism in the local economy is underscored by its substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for as much as 16% of the island's economy. Despite this impressive development, the application fails to simulate how the industrialisation of the seascape and the degradation of environmental quality could adversely affect Tourism Gross Value Added and the broader economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Moreover, the assessment neglects the essential role that environmental quality plays in bolstering tourism, including the critical importance of unspoiled landscapes and dark skies in enriching visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a significant gap in understanding the impacts on a recognized and growing segment of the local economy.

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that prioritise tourism as a key growth sector and lacks sufficient evidence for the competent authority to properly assess the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and account for the island's economic dependency culminates in a significant evidential gap. This deficiency inhibits a comprehensive appraisal of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its ability to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. It is presented now under a

policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

The evidential basis for the proposal is both incomplete and unreliable. There are significant gaps in baseline data, and it relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism, are missing. As a result, the Environmental Impact Assessment fails to provide a complete understanding of likely significant effects or any residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from evaluating the potential impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to adequately protect biodiversity, natural areas, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of any net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant environmental risks associated with the proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

This proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, coupled with conflicts with policy and unresolved environmental risks, hinder any lawful, evidence-based decision-making. The competent authority must refuse consent on these grounds or activate the necessary regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E6320793

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and associated documents has revealed serious deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The development is planned off the west side of the Isle of Lewis, an area cherished for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal raise urgent concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent. Moreover, several key components of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of the potential significant effects, and the unspecified nature of mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident in this proposal, which appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to issues of biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate its ability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and undermine the capacity of the competent authority to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned alarmingly close to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, dependence on undefined mitigation strategies, evidential gaps, and evident policy non-compliance highlight that this application is incomplete and unfit to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to deliver a complete understanding of the ecological receptors involved. This coastal area is known to be biologically rich and sensitive, yet the existing baseline data is insufficient, and the methods employed do not effectively capture essential information about species presence, behaviours, and habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for impact evaluation.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not adequately address or evaluate the active utilisation of coastal regions by otters for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential impacts related to construction disturbances, noise, and increased activity. Such a gap undermines any assertions regarding the lack of significant effects on otter populations.

Furthermore, there are serious shortcomings in the evaluation of basking sharks, particularly as it relies heavily on aerial surveys that are prone to considerable detection biases in Atlantic conditions. This methodology likely leads to an underestimation of the species' presence, especially when compared to established land-based observations that show regular usage of these waters. The failure to integrate or properly consider such crucial data contributes to an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant impacts are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data hampers a meaningful evaluation of cumulative and indirect effects, including those related to seasonal variations and broader ecosystem interactions. This introduces significant uncertainty regarding the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the stipulations set forth by the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to adequately identify or evaluate protected species. The uncertainty created by these inadequacies obstructs the possibility of ruling out adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. In this context, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, affirming that the application does not present a solid evidential basis for approval.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to satisfy the evidential threshold necessary to establish no adverse effect on the integrity of protected sites. This deficiency is underscored by the presence of contradictory conclusions, coupled with significant gaps in data and limitations inherent in the modelling approaches utilised. As a result, the standard of beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and hindering a lawful conclusion in support of consent.

The ornithological assessment is fundamentally flawed, exhibiting substantial gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. Yet, the application fails to meet the required evidential standard demonstrating that these species will not face adverse effects. Key foraging areas and migratory pathways are situated within the proposed development, yet the assessment neglects to thoroughly evaluate the potential implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, whereby the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment lacks adequate evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars that are in critical decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor presents an additional and considerable risk, effectively establishing a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or consider the potential impact on species with relatively small global populations.

The identified deficiencies also reflect a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological inadequacies, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of the impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is troubling and undermines the Environmental Impact Assessment process. Although the developer engaged with local residents through focus groups, the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from grasping the complete extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. However, without access to the full assessment, it is impossible to properly scrutinise the findings or to ascertain their significance in the decision-making process.

Moreover, there is a perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings noting "cultural loss." Despite this acknowledgment, the impacts have not been adequately incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4, particularly regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm; however, existing adverse effects have not been thoroughly disclosed. The absence of the complete assessment means that compliance with this policy cannot be substantiated.

Procedurally, the implications are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which signifies a material omission and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and highlights that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence,

fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding significant cultural heritage sites and high-value landscapes. This raises the possibility that the assessment may have understated the magnitude of visual impact, thereby compromising the overall reliability of the evaluation.

A significant oversight is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation 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 compliance with policy requirements.

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries related to this application lacks robustness and fails to address significant ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital habitats and uses can be preserved without considerable disruption.

A critical concern is the presumption that fishing activity can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of handling increased activity. This lack of information is crucial, as displacing fishing 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 local livelihoods cannot be accurately assessed.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb a wide area, adversely affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application appears to minimise the importance of these effects without adequate supporting evidence.

There is a noticeable inconsistency in the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in light of anticipated harm that may require legal approval.

Moreover, the assessment neglects to address the cumulative impacts stemming from multiple pressures, such as habitat disruption, 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 alignment with National Planning Framework 4 or the National Marine Plan. It falls short of showing that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal represents sustainable development.

In summary, the shortcomings in evidence concerning fishing displacement, the underestimation of acoustic impacts, and internal contradictions render the assessment incomplete and untrustworthy. These deficiencies hinder a comprehensive evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure that is inadequately assessed and does not account for the comprehensive impacts of what constitutes a single integrated project. The separation of offshore turbines from onshore works leads to a disjointed evaluation, masking the true extent of environmental and socio-economic consequences.

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

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

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

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy, the assessment neglects to model the potential effects of industrialisation on the seascape and loss of environmental quality on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis hinders a robust evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development when evaluated against statutory duties and national policy. The application revisits the critical issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This new submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the baseline data provided, and the proposal employs an

undefined design envelope while depending on unspecified mitigation measures. It neglects to address key impact pathways, including effects on nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, lacking the necessary information to fully understand likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose the entire Social Impact Assessment is a notable omission. These flaws hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In addition, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to confirm that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted effectively, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority should either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

As a lifelong long Islander with deep connection to the west coast of the island, with family from the area. I strongly object to this windfarm. Not only to the visual impact it

will have but the Decremental effects it will have on wildlife and the naturally beautiful beaches. This must not happen .

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: D793D9FB

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals numerous material deficiencies across planning, environmental, cultural, and procedural areas. This development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline and rich cultural identity. The proposal's scale, design, and proximity to the shoreline pose significant compatibility concerns with existing statutory requirements, national policy, and sustainable development principles.

The application is severely lacking an adequate evidential basis necessary for lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many aspects of the proposal remain undefined, complicating the assessment of likely significant effects. The reliance on an unspecified flexible design framework, along with unarticulated mitigation measures, means that the effectiveness of these measures cannot be adequately assessed. Consequently, the documents fail to facilitate a full understanding of potential environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsubstantiated by robust evidence.

There are substantial conflicts with established policy. The proposal demonstrates inconsistency with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and overall health and wellbeing. It does not satisfactorily show that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These issues fundamentally challenge the statutory tests necessary for consent and hinder the competent authority's capacity to determine the development's acceptability in policy terms.

The scale of this proposal is unprecedented for this location, with large turbines situated near the shoreline, raising serious concerns related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the application must adhere to the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presented is inadequate and fails to deliver a comprehensive, transparent, or dependable evaluation of the likely environmental consequences of the proposed development. The approach utilising a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This situation obstructs the consistent application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that may ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true magnitude of the environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. The request for consent is predicated on the assumption that environmental harm will be resolved at a later date, which precludes any meaningful assessment of the effectiveness of these measures or evaluation of residual impacts. This deferral of essential information to stages following consent is procedurally unacceptable, undermining the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

Significant evidential deficiencies exist within the assessment, including gaps in baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are posited without robust supporting evidence. The insufficiency of information obstructs a clear comprehension of cumulative and worst-case impacts, fostering scientific uncertainty that contravenes statutory obligations.

As a result of these issues, the application does not satisfy the evidential standard set forth under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including mandates related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an ill-defined design envelope, the lack of specified mitigation measures, and the existence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on environmental

effects. This approach is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. There is a notable absence of a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, the developer has not demonstrated a serious consideration of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in determining impact make this lack of analysis particularly concerning, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, there are significant deficiencies in cable routing and landfall assessment. Insufficient evidence exists to show that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually important areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the principle of mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a material issue 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 evaluation of marine ecology and protected species is significantly lacking, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the data collected is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of the species involved. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

One major oversight concerns otters, which are classified as a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. The lack of analysis surrounding their core foraging range and behavioural patterns means the potential effects of construction-related disturbances, noise, and increased activities have not been adequately evaluated. This oversight undermines any claims regarding the lack of significant

effects on this species.

In addition to the issues with otters, the assessment of basking sharks reveals further deficiencies. The reliance on aerial surveys introduces a significant detection bias, especially in the conditions commonly found in the Atlantic. This approach likely leads to an underestimation of their presence, particularly when compared to established land-based observations that indicate these waters are frequently used by basking sharks. The failure to incorporate or properly consider relevant data results in an incomplete baseline and detracts from the reliability of the conclusions drawn.

These methodological flaws mean that the assessment's conclusions about negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the necessary criteria of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be legally granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed and presents significant gaps in evidence, along with inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application fails to provide adequate evidence that these species will not be adversely impacted. Key foraging areas and migratory pathways are affected by the development, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a contradiction in the application, as the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds

is not fully considered, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe declines, such as Kittiwakes and Fulmars. The methods used likely underestimate mortality rates due to incomplete baseline data and an inadequate understanding of behavioural responses.

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

From a regulatory standpoint, the application does not meet the evidential standards needed to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling issues, fails to fulfil the requirement of being beyond reasonable scientific doubt. This invokes the precautionary principle and obstructs a lawful conclusion that could support consent. Additionally, these shortcomings indicate a lack of compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

Overall, the assessment is unreliable, marked by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the legal requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with this proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, making it impossible for both the public and the competent authority to grasp the full extent of the social risks identified in the developer's own research.

Reports indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore factual rather than speculative. The failure to make the full assessment available stifles proper scrutiny of the findings, thus limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's

findings. However, these serious impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The withholding of the comprehensive Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency is detrimental to the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality may be at stake. By not providing the complete dataset, the application fails to supply a comprehensive evidential basis needed to assess the balance between benefits and harms.

From a policy standpoint, the application does not meet the requirements of the National Planning Framework 4 concerning health and wellbeing. Development is expected to promote positive health outcomes and minimise harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications of this situation are considerable. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application, which fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This failure obstructs a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline has an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposal for large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The application fails to represent 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 impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact on such a sensitive landscape.

Methodological issues are present in the selection and representation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the true

magnitude of visual impact may have been understated, which calls into question the reliability of the assessment.

There is also a failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This results in not just a visual impact, but a more extensive cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further weakens any claims of compliance with policy requirements.

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

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current proposal presents significant deficiencies in its assessment of construction and pollution risks, failing to deliver the necessary detail to evaluate potential environmental impacts. Notably, there is a lack of fully developed Construction Environmental Management Plans or Pollution Prevention Plans, despite the substantial seabed preparation and installation works required in the high-energy Atlantic environment. The application relies on mitigation and contingency measures that will only be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures is particularly alarming, given the sensitivity of the receiving environment along the West Lewis coastline. This area is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate

detail on the prevention, control, or monitoring of these threats.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies renders it impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to the potential effects on marine species and habitats identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures, which raises further concerns. By postponing contingency planning to a post-consent stage, the application inhibits the assessment of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures during the determination phase.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed prior to consent, and the absence of such information means a lawful determination cannot occur. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are

downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of onshore infrastructure is fundamentally incomplete and neglects the comprehensive impacts associated with what is fundamentally one integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately, leading to a fragmented understanding that obscures the overall environmental and socio-economic repercussions.

Included within the onshore components are the cabling that will traverse protected moorland, the construction of a substation in the vicinity of Stornoway, and the associated access infrastructure that cuts through sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, an important carbon sink and ecologically significant habitat. The application lacks a thorough assessment of these impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered in unison, yet the disaggregation of offshore and onshore components means that the total impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to vulnerable habitats, including machair systems and peatland environments, which are protected under existing policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to provide evidence that necessary consents or processes have been undertaken, leading to doubts about the project's feasibility and legal compliance.

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

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

TOURISM

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

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

Additionally, the assessment neglects the critical role environmental quality plays in enhancing tourism, including the significance of unspoilt landscapes and dark skies for

visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

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

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

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

SUMMARY

The 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 live right on the door step where this is planned to be. I have been in Brue my whole life, it seems to me as if we as a community are being completely used and taken advantage of by the people who say they are there to help us and look after our best interests. But as far as I can see this will be of zero benefit to the local community, it will impact every single person on Lewis. First they try and close all in land fishing(hpma) but after alot objection by the locals and families that depend on the fishing that keeps LOCAL families in work and support local schools and shops. Now if this wind farm does go ahead now removes a massive area that can not be worked meaning these LOCAL fishermen will have to move grounds or away to make it viable. These men have been sustainably fishing these grounds for years and now to have it removed from them. We have a declining population on the island, people are in fuel poverty and people struggling to keep their head above water. Of what benefit is this going to be to us?the people who it will affect the most. I find this green energy thing a bit of smoke and mirrors anyway. theres nothing green about this.I do understand that we should be looking a better ways of producing our power, why is tidal or hydro not being pushed

more than wind? tidal is predicable and is a constant, hydro is predicable and controllable.

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: 7F37DDCA

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoilt environment, and rich cultural heritage. The proposal raises serious concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and various critical aspects of the proposal remain undefined. The reliance on a flexible design framework obscures an understanding of potential significant effects, while the dependence on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed assessment of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack solid evidence.

There are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These policy inconsistencies directly impact the statutory tests required for consent and jeopardise the ability of the relevant authority to deem the development acceptable according to policy guidelines.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual dominance, and environmental repercussions. The lack of adequate information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident non-compliance with policy collectively indicate that the application is deficient and does not support a lawful determination. In light of these factors, the precautionary principle must be applied.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented in the application is fundamentally flawed, featuring significant evidence gaps and internal contradictions that compromise its conclusions. The assessment fails to adequately demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

A notable inconsistency arises from the developer's assertion of no significant adverse effects alongside the advancement of a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This contradiction raises questions regarding the assessment's reliability and suggests that the conclusions drawn lack robust support from the underlying evidence. Moreover, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The crucial nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Given that baseline data is often incomplete and behavioural responses remain poorly understood, the methodologies employed are likely to underestimate potential mortality rates.

Furthermore, the placement of turbines within a recognised migratory corridor presents an additional and serious risk. This positioning effectively obstructs a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately addresses the long-term consequences of continued mortality in this corridor or the impacts on species with limited global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards necessary to ascertain no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling limitations, fails to meet the requisite standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and obstructs a lawful conclusion supporting consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected positions the proposal directly against national policy. Collectively, these flaws render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings hinder a thorough evaluation of impacts and culminate in the overall conclusion that the application does not fulfill the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the development's impact on cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a living cultural landscape that interlinks environment, language, tradition, and community. By adopting a narrow perspective, the application treats heritage as a collection of isolated, static features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are mischaracterised as static features. This neglect of their ongoing use and significance leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Additionally, the assessment fails to account for intangible cultural heritage, such as the Gaelic language and the traditions that have fostered a deep connection between the community and the coastal environment. These vital components are essential to the area's identity yet are conspicuously absent from the assessment, highlighting a considerable oversight. Without recognising these elements, it is impossible to fully comprehend the cultural impact of the proposed development.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the lack of Free, Prior and Informed Consent processes undermines the assessment's validity. This failure to engage meaningfully with the community compromises the integrity of the evaluation and neglects established participatory principles concerning cultural and environmental matters.

Moreover, the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018, represents a critical procedural failure. This assessment is essential for the competent authority to meet its legal obligation to assess social, cultural, and economic impacts on the island community. Its omission alone precludes a lawful determination.

From a policy standpoint, these shortcomings directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the failure to acknowledge living cultural practices constitute a significant deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and adherence to statutory obligations leads to a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for evaluating the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes is significantly inadequate, failing to capture the sensitivity of the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally transforming this landscape and causing permanent alteration.

The evaluation does not sufficiently convey the extent of the visual change that would arise. Given the scale and proximity of the turbines, they are poised to dominate views from residential areas, historic locations, and popular coastal sites. This would negatively affect visual amenity and diminish the natural and remote qualities that define the area. The assessment neglects to accurately reflect this level of impact and its significance within the context of such a vulnerable landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, thus questioning the reliability of the overall assessment.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been thoroughly evaluated. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context linked by visual and spatial relationships to the Atlantic horizon. By treating these heritage assets as isolated entities, the assessment fails to appreciate their interdependence, leading to an incomplete understanding of how impacts affect their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which heritage assets are perceived and severing their ties to the natural horizon. This constitutes not only a visual impact but also broader cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, especially concerning the protection of natural environments and historical assets. The magnitude of change is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

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

In summary, the assessment fails to accurately depict the impact scale, the environmental sensitivity, and the interconnectedness of landscape and heritage.

These shortcomings undermine the ability to provide a reliable evaluation and underscore the conclusion that the proposal is incompatible with the need to protect this landscape.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these uses and habitats can be protected or maintained without major disruption.

One critical concern is the assumption that fishing activities can be displaced without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or can sustain additional pressure. This is a serious oversight, as displacement could lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear and evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal introduces substantial risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling for extended periods is expected to cause disturbances over considerable distances, which could adversely affect species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the importance of these impacts without adequate supporting evidence.

Inconsistent statements within the application also raise concerns. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises doubts about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project involves both offshore turbines and extensive onshore works, which are closely interconnected yet assessed independently. This separation leads to a fragmented evaluation that fails to reveal the overall environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. Excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat, is a crucial concern. However, the application does not offer a thorough assessment of these impacts, thus obscuring the project's total environmental footprint.

The lack of comprehensive assessment extends to the cumulative effects of the project. By excluding or deferring the evaluation of onshore impacts, the application hinders a proper understanding of the combined effects on peatlands, habitats, and local communities. The Environmental Impact Assessment process mandates that all elements of a project be considered together. Nonetheless, the disjointed approach to assessing offshore and onshore components means the full extent of impacts on sensitive habitats, such as machair systems and peatland environments, remains unclear. These habitats are under policy protection, yet the application fails to demonstrate that their impacts have been fully evaluated or that suitable avoidance measures are in place, leaving a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises urgent concerns about carbon balance. Disturbing peatland not only releases stored carbon but may also result in a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and does not prove that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces further complications, creating potential conflicts with existing land use and legal rights. The application lacks sufficient evidence that the necessary consents or processes have been initiated, which raises serious doubts regarding both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as a complete entity and to show the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The application's inability to demonstrate that impacts can be avoided or mitigated further undermines its credibility.

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application not only incomplete but also unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a serious shortfall within the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, is crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors such as astro-tourism. The introduction of permanent red aviation lighting, which would be visible over extensive distances, risks creating an intrusive "wall of light" effect that would significantly disrupt the natural night-time environment.

There is no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning considering the significance of dark skies to the local identity. Moreover, the assessment fails to address the implications for nocturnal wildlife, including species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are particularly vulnerable to artificial lighting due to their phototactic responses that may lead to disorientation and increased collision risks. The application does not provide a lighting impact assessment or a phototaxis study, meaning the potential effects of aviation lighting on these species, along with the associated mortality risks, remain unexamined.

This critical oversight is exacerbated by an overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or the risks they entail. Species such as Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been included in the assessment. The absence of specific data regarding night-time conditions creates a significant gap in understanding the ecological impacts involved.

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

From a policy standpoint, this oversight is at odds with National Planning Framework 4, which pertains to the safeguarding of natural spaces and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time environments is a fundamental component of the broader ecological context.

In summary, the absence of assessments concerning dark skies and nocturnal wildlife creates a substantial evidential void. The lack of baseline data, impact modelling, and

species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

TOURISM

The analysis of the economic and social consequences of tourism on the Isle of Lewis is seriously lacking and does not account for the essential role this sector plays in the local economy. Tourism relies heavily on the area's wild coastline, unspoilt landscapes, dark skies, and a sense of remoteness. Despite the application stating that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or overall economic contribution.

Since 2017, tourism has seen substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model the potential effects of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or harm an established and thriving sector.

The assessment neglects to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leading to a considerable gap in understanding the impacts on this recognised and expanding segment of the local economy.

In a community like the Isle of Lewis, which has limited economic diversification, the failure to evaluate the impacts on tourism has far-reaching implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately assessed as required by 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 a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to present sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This hampers a thorough 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 fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now put forward under a policy framework that places heightened emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided in the application is both incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and there is a reliance on unspecified mitigation measures. Furthermore, important impact pathways are omitted, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedural failings are also evident. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a notable omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the principles laid out in National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural spaces, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot evidence a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, masking effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistently documented. The requisite evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and prevents a lawful conclusion that the impacts are acceptable.

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

Taken as a whole, the application is procedurally and substantively inadequate for determination. The numerous information deficiencies, coupled with policy conflicts

and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I do not believe that this development is in the interests of the culture, economy or environment of the Western Isles. This area is one of the UKs most sensitive environments and as it stands this development will cause generations of damage for very little benefit to the population and environment of Lewis nor indeed the UKs renewable energy targets.

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: B8E74D73

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

Dear Sir/Madam

This letter formally objects to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and related materials, revealing significant planning, environmental, cultural, and procedural shortcomings. The wind farm is proposed for the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project with statutory requirements, national policies, and sustainable development principles due to its scale, proximity to the shore, and design.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Moreover, several key elements of the proposal remain undefined. The flexible design framework used complicates the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal contradicts the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate issues, and environmental integrity. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to affirm that the project aligns with policy standards.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the coastline, raises serious concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential gaps, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is deeply

flawed. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. This deficiency undermines any valid evaluation of potential impacts.

Particularly concerning is the omission of otters, a European Protected Species, which have not been properly recognised or assessed for their active use of the coastal areas for foraging and movement. The lack of consideration of their core foraging range and behaviour raises significant concerns about the potential effects of construction disturbances, noise, and increased activity. Consequently, this oversight compromises the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is inadequately addressed, relying on aerial surveys that introduce considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. This failure to incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that the findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess the cultural heritage and community identity of the West Lewis coastline, which is a vibrant cultural landscape where the environment, language, tradition, and community are intertwined. Instead of recognising this complexity, the application adopts a simplistic view, treating heritage as mere isolated features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the handling of culturally important sites such as

the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment reduces them to static entities, neglecting their continued use, meaning, and the consequences of development on their surroundings. This mischaracterisation leads to a partial understanding of the cultural implications and overlooks their integral role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, alongside the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a significant gap in understanding. Without these considerations, the true cultural impact of the development remains elusive.

Concerns surrounding community rights and engagement also arise, as the Gaelic-speaking population possesses a distinct cultural identity akin to that of an Indigenous People. Despite this, there has been no process of Free, Prior and Informed Consent conducted. The lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters affecting cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to analyse the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the application unlawful.

From a policy standpoint, these deficiencies position the proposal in direct conflict with National Planning Framework 4, particularly regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, represents a clear violation of policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not present an adequate basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in assessing social impacts, health, and wellbeing is a significant concern. The developer's Social Impact Assessment included focus groups with local residents, yet the complete report remains unpublished. This creates a considerable gap in evidence, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified in the developer's research.

Summaries indicate that local residents are experiencing stress, anxiety, and concern related to the proposal's scale and proximity. These impacts stem from direct engagement and are based on actual feedback, not speculation. However, without access to the full assessment, scrutiny of these findings is limited, making it difficult to gauge their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and cohesion, as “cultural loss” has been identified in the developer's findings. Despite this acknowledgment, the impacts have not been adequately incorporated into the main application or given the necessary consideration. The absence of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this nature, particularly when community character and functioning are at stake. The failure to provide the complete dataset means the application does not offer a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and minimise harm, yet the existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission is material and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, along with evidence of existing adverse effects, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance

on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

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

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

The environmental and visual impact of this development, and the effect on the health of those nearby will be profoundly negative. It should not go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4942C111

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment processes. A careful review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, combined with its proximity to the shoreline, lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, and reliable account of the likely environmental effects associated with the proposal. A significant concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and undermines the integrity of the assessment, preventing the consistent application of a worst-case scenario. As a result, the impacts presented may not accurately reflect what will ultimately be constructed, hindering both public understanding and the ability of the competent authority to grasp 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 under the premise that environmental harm will be addressed subsequently prevents any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established prior to determination.

The report also exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the scale and significance of impacts, particularly in cases 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 scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application fails to meet the evidential threshold required under the Habitats Regulations, as it cannot exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements 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 undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of environmental effects, meaning that the competent authority cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed project lacks a sufficient assessment of alternatives and does not adhere to the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application only provides a narrative account detailing the evolution of the project. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging alternatives.

Furthermore, there is a lack of transparent, evidence-based comparisons of different offshore locations, development scales, and design configurations. The developer has not convincingly considered the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be lessened. Given the sensitivity of the West Lewis coastline and the critical role that proximity to the shore plays in impact assessments, the absence of such analysis undermines any assertion that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analyses suggest that mitigation by design has not been adequately applied, instead relying heavily on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and does not offer a reliable understanding of ecological receptors in the West Lewis coastal area. This region is biologically rich and sensitive, yet the baseline data is lacking, and the methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species. Consequently, the assessment fails to present a sound evidential basis for evaluating potential impacts.

Significant concerns arise regarding otters, which are classified as a European

Protected Species. The application neglects to properly acknowledge their active foraging and movement within coastal regions. The failure to consider their core foraging range and behavioural patterns raises questions about the adequacy of assessing potential disturbances from construction activities, noise, and increased human presence. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Furthermore, the assessment of basking sharks is similarly inadequate, as it relies heavily on aerial surveys that introduce a significant detection bias, particularly under Atlantic conditions. This approach risks underestimating their presence in these waters, especially when juxtaposed with established land-based observations that indicate frequent usage. The neglect to incorporate or properly evaluate such data contributes to an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of comprehensive baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the actual risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment reveals significant flaws, with notable evidence gaps and inconsistencies that undermine its findings. The application fails to establish to the necessary evidential standard that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse impacts. Key foraging areas and migratory pathways are situated where the development is proposed, yet the assessment does not adequately address the potential consequences of displacement, collision risks, or habitat loss.

There is a fundamental contradiction within the application; the developer asserts that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated.

This inconsistency raises concerns about the assessment's reliability and suggests that its conclusions are not well-supported by the available evidence. Furthermore, the assessment does not sufficiently demonstrate that seabird populations associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are in serious 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 location of turbines within a recognised migratory corridor presents an additional risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not properly evaluate the long-term impacts of sustained mortality in this corridor or the potential effects on species with small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and hinders a lawful conclusion in support of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to prove that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable, due to internal inconsistencies, methodological shortcomings, and inadequate evidence. Such failings hinder a robust impact evaluation and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the assessment neglects to evaluate intangible cultural heritage, which

encompasses the Gaelic language, local traditions, and the enduring relationship that the community maintains with the coastal environment. These aspects are fundamental to the identity of the area, yet they are entirely omitted from the evaluation, creating a substantial gap in understanding the cultural implications of the development.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment is a serious concern that undermines the evaluation of social impacts, health, and wellbeing related to this development proposal. Although the developer engaged local residents through focus groups, the full report has not been made available, creating a significant evidential gap. This lack of transparency hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Available summaries reveal that local residents are already feeling stress, anxiety, and concern as a result of the proposal's scale and proximity. These effects arise from direct engagement and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the ability to assess their importance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and

cohesion, with “cultural loss” explicitly noted in the developer’s findings. Despite this critical information, the impacts have not been adequately integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they may affect community character and functioning. By failing to provide the full dataset, the application lacks a comprehensive evidential basis for weighing benefits against potential harm.

From a policy perspective, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential criteria of the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create an industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately represent the magnitude of visual change expected from this development. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which directly impacts visual amenity and undermines the defining qualities of naturalness and remoteness.

Concerns regarding the methodology used for selecting and presenting visual viewpoints further exacerbate the deficiencies in the application. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This suggests that the assessment has understated the visual impacts, casting doubt on its reliability.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connections to the natural horizon. This represents a broader cultural and spatial harm that the application has not adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of proposed change does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. The anticipated change is fundamental and permanent, making it unlikely that any mitigation measures could reduce the impacts to an acceptable level.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding the assessment of construction and pollution risks, making it impossible to properly evaluate the potential environmental effects. Significant seabed preparation and installation works are planned for a high-energy Atlantic environment; however, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns 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. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

There remains 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 not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings hinder 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 associated with the application is inadequate, failing to offer a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses will be protected or maintained without significant disruption.

A notable concern arises from the assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This gap is critical, as such displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population

is concerning; nevertheless, the application tends to underestimate the significance of these effects and lacks adequate supporting evidence.

There exists a contradiction within the application regarding the necessity of licences for harming European Protected Species, while impacts are concurrently described as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering the determination of whether the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is incomplete and fails to capture the full range of impacts associated with what constitutes a single integrated project. The onshore and offshore components, including the construction of a substation near Stornoway and cabling across protected moorland, are linked. However, they are currently assessed separately, which leads to a fragmented understanding of the true environmental and socio-economic consequences.

Significant ecological risks arise from the proposed works, particularly due to excavation in areas of deep peat on Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The application does not adequately address or assess these impacts, leading to an incomplete picture of the project's overall environmental footprint. Additionally, sensitive habitats, such as machair systems and peatland environments, are protected under policy, yet the application does not show that impacts on these areas have been thoroughly evaluated or that suitable avoidance measures are in place, resulting in a notable gap in evidence regarding biodiversity protection.

The proposal further raises alarm over carbon balance. Disturbing peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the objectives of renewable energy initiatives. The application inadequately tackles this

issue, failing to demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights, as the application does not provide evidence of having initiated the necessary consents or processes. This absence raises concerns about the feasibility and legality of the project's implementation.

On a policy level, the disjointed assessment of the project and the lack of demonstrated protection for peatlands, habitats, and land use interests conflict with established frameworks, including the National Marine Plan and National Planning Framework 4. The failure to show that impacts can be avoided or mitigated further weakens the application.

In summary, the combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts results in a substantial shortfall in the application, rendering it incomplete and unreliable. This compromises the possibility of a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration will fundamentally change the night-time environment. There is a significant omission in the Environmental Impact Assessment regarding dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The failure to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is concerning, especially as dark skies are increasingly important to emerging tourism sectors such as astro-tourism.

Moreover, the proposal lacks an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a higher risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which leaves unaddressed how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it fails to capture nocturnal activity or the associated risks. Other species, including Kittiwakes, may forage or migrate at night and are also vulnerable to the disorienting effects of artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and thereby preventing a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4, which concerns the protection of natural places and environmental quality. It also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is a crucial component of the environment. Collectively, the lack of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts is critically lacking and fails to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and its sense of seclusion. Although the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

The tourism sector has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such crucial analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise a thriving sector.

Moreover, the assessment does not take into account the significance of environmental quality in enhancing tourism, particularly the vital roles of unspoiled landscapes and dark skies in visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a substantial void in understanding its impacts on a recognised and expanding segment of the local economy.

In light of the island community's limited economic diversification, the oversight in evaluating tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the requirement to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as

a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

The cumulative effect of these shortcomings—failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and overlooking the island's economic dependencies—creates a significant evidential gap. This obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding sustainable development and does not meet the necessary statutory duties. It mirrors the issues that caused the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more stringent policy framework that emphasises biodiversity and community wellbeing, it fails to provide a comprehensive evidential basis for assessment.

Critical gaps in baseline data and reliance on an undefined design envelope undermine the application. There are also unspecified mitigation measures and significant omissions, such as impacts on nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects and residual impacts.

Additionally, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment is a substantial omission. These issues prevent the competent authority from effectively evaluating impacts on community wellbeing and cultural identity, making the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to safeguard biodiversity, natural places, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, complicating assessments related to peatlands, carbon balance, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The application does not meet the evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would bring about substantial and irreversible changes to a

sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption of cultural and visual relationships are permanent effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is essential for the competent authority to refuse consent for the Spiorad na Mara Offshore Wind Farm application or require the submission of the missing information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 43C1371A

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

Dear Sir/Madam

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

A thorough review of the Environmental Impact Assessment Report and its supporting documentation reveals that the application does not provide an adequate evidential basis for lawful determination. Key environmental data is absent, baseline information appears limited and inconsistent, and several critical aspects of the proposal are not clearly defined. The use of a flexible design framework hampers understanding of likely significant effects, and reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation fails to facilitate a complete or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, there are distinct and substantive conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests required for consent and weaken the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal, involving large turbines situated in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not give a clear or dependable account of the potential environmental impacts of the proposed development. There is significant uncertainty due to the use of a flexible Project Design Envelope, which avoids commitment to specific details such as turbine dimensions and layouts. This uncertainty hinders a consistent worst-case scenario analysis and compromises the overall integrity of the assessment. Consequently, the public and the competent authority are unable to grasp the full scope of the environmental effects that the project may cause.

The application depends heavily on mitigation strategies, monitoring plans, and management measures that have not been outlined. By seeking consent based on the promise that environmental damage will be mitigated later, the application prevents any thorough assessment of the effectiveness of these measures or consideration of residual impacts. This postponement of essential information until after consent is granted is unacceptable from a procedural standpoint and undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined before any decisions are made.

There are notable gaps in evidence, such as insufficient baseline data, methodological limitations, and a reliance on assumptions instead of solid, site-specific evidence. This lack of information creates uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficient detail leads to an unclear picture of cumulative and worst-case impacts and introduces scientific uncertainties that conflict with statutory requirements.

Therefore, the application does not fulfil the evidential standards set by the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation calls for the precautionary principle to be applied, particularly concerning protected species and vulnerable habitats. Moreover, the proposal does not satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the necessary statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment of alternatives. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the documentation presents a

narrative account of how the project evolved. This method does not demonstrate that less harmful options were properly identified, assessed, and selected over more damaging solutions.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has thoroughly considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impacts highlight the significance of this omission. The absence of such analysis precludes any conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to cable routing and landfall assessments, with insufficient evidence indicating that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. This includes significant areas such as Barvas Cemetery, which hold cultural and spiritual importance. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been properly applied, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material deficiency that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents an assessment of marine ecology and protected species that is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation to evaluate potential impacts effectively.

Notably, the assessment neglects to properly acknowledge the presence of otters, which are classified as a European Protected Species. It fails to assess their active usage of coastal areas for foraging and movement. This oversight regarding their core

foraging range and behavioural patterns results in an inadequate evaluation of potential impacts stemming from construction disturbances, noise, and increased activity. Such omissions compromise the conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, which suffers from a reliance on aerial surveys that introduce considerable detection bias, particularly in challenging Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks when compared to established land-based observations that demonstrate frequent utilisation of these waters. The lack of integration or thorough consideration of such pertinent data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings give rise to conclusions about negligible or non-significant effects that rest on assumptions rather than rigorous evidence. The inadequacy of baseline data also hampers the ability to assess cumulative and indirect impacts meaningfully, including those stemming from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the real extent of risks posed 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 adequately identified or assessed protected species. The uncertainty introduced by these deficiencies hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment as a whole unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species, affirming that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The development site is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected. It does not adequately evaluate the risks associated with displacement, collision, or habitat loss for these birds.

There exists a fundamental contradiction within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment

and suggests that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It does not fully consider the importance of their feeding grounds, and the reliance on modelling approaches adds a layer of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used appear likely to underestimate mortality, especially where baseline data is inadequate and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor introduces additional significant risks, creating a barrier within a primary flight path utilized by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential effects on species that have 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 effect on the integrity of protected sites. The presence of contradictory conclusions, combined with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places 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 obstruct a robust evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal's assessment of cultural heritage and community identity is fundamentally flawed. It fails to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active places of burial and spiritual practice. The assessment overlooks their continued use and meaning, failing to appreciate how the proposed development would affect their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and neglects their importance to

community life.

Moreover, the application does not adequately consider intangible cultural heritage, including the Gaelic language and local traditions, nor does it reflect the enduring relationship between the community and the coastal environment. These factors are essential to the area's identity, yet they are entirely excluded from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains obscured.

There are also significant issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been consulted through a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a severe procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is critical and prevents a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear divergence from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a solid foundation for determining the actual cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the complete report has not been published. This significant evidential gap limits both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's research. The absence of the full assessment not only inhibits proper scrutiny of the findings but also restricts the determination of the significance of these impacts within the decision-making process.

Summaries of the assessment suggest that residents are currently experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are therefore not speculative. Additionally, there is evidence indicating that the proposal poses a direct threat to

community identity and cohesion, with findings from the developer indicating a risk of “cultural loss.” Yet, these impacts have not been adequately integrated into the main application nor given appropriate consideration.

The withholding of the full Social Impact Assessment obscures the true human and social costs of the proposed development, undermining the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health impacts for developments of this scale, especially where community character may be affected. By failing to provide the complete dataset, the application does not present a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the available evidence points to existing adverse effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses an immediate risk of creating a continuous industrial presence that would fundamentally alter this character. This transformation of the landscape would be permanent and irreversible.

The application fails to adequately represent the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would erode the essential qualities of naturalness and remoteness and significantly impact visual amenity. The assessment does not convey the true level of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes.

This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these as isolated assets neglects their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This impact transcends visual implications, introducing broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect 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. Furthermore, the lack of a thorough worst-case assessment weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate detail for assessing construction and pollution risks, rendering the evaluation of likely environmental effects incomplete. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will be prepared post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

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

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment related to fisheries and marine life is profoundly inadequate, lacking a thorough evaluation of the ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a bustling fishing industry. However, the application does not provide assurance that these vital uses and habitats will be safeguarded or maintained without substantial disruption.

A critical concern arises from the assumption that fishing activities can simply be displaced without repercussions. The application fails to present any evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This significant gap in the assessment raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based analysis, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across

considerable distances, especially species such as dolphins. The predicted disturbance to a considerable segment of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects, lacking sufficient evidence to support its claims.

There is a troubling inconsistency within the application where the need for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises alarming questions regarding compliance with the Habitats Regulations, especially where harm is anticipated to an extent that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist harmoniously with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal aligns with the principles of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns regarding the incomplete assessment of onshore infrastructure and its associated impacts, which are crucial for understanding the entirety of this integrated project. The offshore turbines and the onshore works are inherently connected, yet the current evaluation treats them as separate entities. This fragmented assessment obscures the true extent of environmental and socio-economic effects.

Onshore works encompass cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is ecologically sensitive and serves as a significant carbon store. The lack of a comprehensive assessment of these impacts fails to provide a full understanding of the project's overall environmental footprint.

The application's decision to exclude or defer the assessment of onshore impacts inhibits a thorough evaluation of cumulative effects. The Environmental Impact

Assessment process stipulates that all project components must be examined collectively. However, the disjointed consideration of offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Additionally, there are substantial risks 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 comprehensively evaluated, nor does it outline appropriate avoidance measures, leading to significant gaps in biodiversity protection.

Concerns are also raised regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially incurs a carbon debt. This situation stands in opposition to the goals of renewable energy development. The application fails to address this matter adequately, nor does it show that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the requisite consents or processes have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project holistically, alongside the inability to demonstrate protection for peatlands, habitats, and land use interests, contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence regarding the avoidance or mitigation of impacts further undermines the application.

In summary, the disconnection of project components, the absence of a thorough assessment, and insufficient evidence related to environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate how this lighting may impact visual amenity, landscape character, and the experiences of both residents and visitors. This is especially pertinent given the importance of dark skies to the region's identity and the emerging tourism sector focused on astro-tourism. The lack of consideration for these impacts

represents a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study in the application means that the potential effects on these species and the likelihood of increased mortality are not addressed.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a crucial gap in understanding ecological impacts.

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

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

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

TOURISM

The assessment of tourism impacts within the application is inadequate and does not address the economic and social ramifications for a vital segment of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. It is noted that 86% of visitors are attracted by the scenery; however, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen notable growth, rising from £65 million in 2017 to more than £81.5 million, and it supports over 1,000 jobs, representing up to 16% of the island's economy. Yet, the application lacks a model to examine how the industrialisation of the seascape and deterioration of environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the area. Without such critical analysis, it remains uncertain whether the development would provide a net economic benefit or

hinder an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, such as the value of unspoiled landscapes and dark skies to the visitor experience. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the impacts on a recognised and burgeoning aspect of the local economy, including nature-based tourism and astro-tourism.

Considering the context of an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately assessed, as mandated by the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors driving visitor behaviour, and acknowledging the island's economic reliance lead to a significant evidential gap. This hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties, national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis for determination. The application lacks complete baseline data, relies on an undefined design envelope, and specifies mitigation measures that have not been fully articulated. It omits essential impact pathways concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The absence of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018. Furthermore, not disclosing the complete Social Impact

Assessment is a significant omission. These deficiencies hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

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: A2D8E078

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural heritage. Concerns arise from the scale, design, and proximity of the proposal, questioning its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful assessment. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, many key elements of the proposal remain undefined. This flexible design framework hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are evident and serious policy conflicts inherent in this proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

Moreover, the unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report render it unreliable and incomplete, fundamentally compromising the ability to assess the environmental effects of the proposal. The absence of defined turbine dimensions, layouts, or configurations within the flexible Project Design Envelope introduces significant uncertainty. This lack of commitment prevents the application of a worst-case scenario analysis, which is essential for understanding the true extent of environmental impacts. As a result, both the public and the competent authority are left without a clear picture of how the development might ultimately affect the environment.

Furthermore, the application is heavily dependent on mitigation measures, management plans, and monitoring strategies that remain undefined. Seeking consent on the basis that environmental harm will be addressed later is procedurally unacceptable, as it obstructs a meaningful evaluation of the effectiveness of these measures and assessment of any residual impacts. This deferral of critical information to post-consent stages conflicts with the requirements of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation strategies must be clearly established before any determination is made.

In addition, there are significant evidential gaps, including insufficient baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. These issues result in uncertainty regarding 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 hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not comply with National Planning Framework 4, which includes stipulations for biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and significant gaps in baseline data culminate in an Environmental Impact Assessment Report that is not fit for purpose. These inadequacies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, failing to

recognise this complexity. It adopts a reductive approach, treating heritage as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This unique character would face a permanent and irreversible transformation with the introduction of large-scale turbines near the shoreline, creating a continuous and dominant industrial presence. The application fails to adequately reflect the scale of change and the sensitivity of the receiving environment.

The visual impact of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the

essential qualities of naturalness and remoteness. There are significant concerns regarding the selection and presentation of visual viewpoints, which may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the visual impacts may have been understated, calling into question the reliability of the assessment.

Additionally, the assessment overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. By treating these as isolated assets, the assessment fails to capture their interdependence, leading to an inadequate evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships and disrupt the context in which heritage assets are experienced, representing not only a visual impact but also a broader cultural and spatial harm that has not been properly assessed.

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

The impacts identified are substantial and cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, with no possibility of reduction 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 interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is fundamentally lacking and fails to provide the necessary detail for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that would be developed after consent, which limits any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment

mobilisation and accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies for these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This situation introduces procedural risks and diminishes the ability of the competent authority to assess the effectiveness of environmental protection measures during the decision-making process.

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

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application remains incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnected nature of the offshore turbines and onshore works. This fragmented evaluation obscures the full extent of the environmental and socio-economic impacts associated with this single integrated project.

Critical onshore elements include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together; however, the disaggregation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that these habitats have been fully evaluated or that appropriate avoidance measures are in place, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland may release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. This issue is not adequately addressed in the application, which fails to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, prompting doubts about deliverability and legal compliance.

From a policy standpoint, the failure to assess the project comprehensively 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 separation of project components, the lack of thorough assessment, and the absence of supporting evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a lawful determination.

TOURISM

The Isle of Lewis tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application in question does not adequately assess the potential economic and social consequences for this critical sector, particularly in relation to how large-scale offshore infrastructure might influence visitor numbers and behaviours. Although the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a quantified analysis of how the proposed development could affect the overall economic contribution of tourism.

Environmental quality plays a crucial role in attracting visitors, with unspoiled landscapes and dark skies significantly enhancing the visitor experience. The

application neglects to account for these environmental factors, including the growing importance of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding how these elements contribute to the local economy.

Given the limited economic diversification within the island community, the lack of a thorough tourism impact assessment raises broader concerns regarding employment, local businesses, and community sustainability. The application also fails to present a compliant Island Communities Impact Assessment, as required by the Islands (Scotland) Act 2018, which means these economic vulnerabilities remain unexamined.

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

In summary, the combined failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic reliance on tourism results in a significant evidential gap. This deficiency hampers a comprehensive evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development, particularly when measured against statutory duties, national policy, and evidential standards. It mirrors the issues identified in the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more rigorous policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

Additional Comments

Having built a career in tourism on the islands, this proposed project, if realised, will have a huge and irreversible impact on our landscape and attractiveness of this location. While it is appreciated that the financial impact of the proposed project may lead to an increase of supporting job growth, this would be on a low local scale and would mostly benefit larger external trades. The return to the island would be minimal. The size and area coverage of the proposed turbines seem to be largely driven by external conglomerate benefit from a largely rural area and blotting our landscape.

I am fully opposed to this scheme as the negatives far outweigh the benefits. The cost of building and transporting the turbine parts as well as the disturbance to the seabed and general wildlife, the land works required to bring them to operational status, would nullify any supposed benefit through the green agenda.

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: 637D0D73

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

There is a concerning lack of adequate evidential support for a lawful determination within the application. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and key components of the proposal remain unspecified. The use of a flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust evidence.

The proposal is marked by clear and substantive conflicts with established policies. It is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to deem the development acceptable within policy frameworks.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks 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 evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to deliver a complete understanding of the ecological receptors involved. This coastal area is known to be biologically rich and

sensitive, yet the existing baseline data is insufficient, and the methods employed do not effectively capture essential information about species presence, behaviours, and habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for impact evaluation.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not adequately address or evaluate the active utilisation of coastal regions by otters for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential impacts related to construction disturbances, noise, and increased activity. Such a gap undermines any assertions regarding the lack of significant effects on otter populations.

Furthermore, there are serious shortcomings in the evaluation of basking sharks, particularly as it relies heavily on aerial surveys that are prone to considerable detection biases in Atlantic conditions. This methodology likely leads to an underestimation of the species' presence, especially when compared to established land-based observations that show regular usage of these waters. The failure to integrate or properly consider such crucial data contributes to an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant impacts are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data hampers a meaningful evaluation of cumulative and indirect effects, including those related to seasonal variations and broader ecosystem interactions. This introduces significant uncertainty regarding the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the stipulations set forth by the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to adequately identify or evaluate protected species. The uncertainty created by these inadequacies obstructs the possibility of ruling out adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. In this context, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, affirming that the application does not present a solid evidential basis for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The application reduces heritage to isolated, static assets, disregarding their ongoing social, cultural,

and spiritual significance within the community.

Culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are misrepresented in the assessment. These locations serve as active sites of burial and spiritual practice, yet they are classified as static features. This mischaracterisation neglects their current use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and dismissing their importance within community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These aspects are integral to the area's identity but have been entirely omitted from the assessment, creating a significant gap. Without addressing these factors, the true cultural impact of the development remains poorly understood.

Concerns extend to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement questions the legitimacy of the assessment and neglects established principles regarding participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any lawful determination impossible.

From a policy standpoint, these shortcomings clash directly with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, indicates a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural consequences of the development have not been adequately examined, and the application does not establish a sufficient foundation for evaluating the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is inadequate and lacks the necessary transparency for a lawful evaluation. While the developer engaged local residents through a commissioned Social Impact Assessment and focus groups, the full report remains unpublished. This omission creates a considerable evidential gap, hindering both public understanding and the competent

authority's ability to fully grasp the social risks highlighted by the developer's research.

Moreover, available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement, not speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings adequately or ascertain their significance within the decision-making framework.

There are also indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" mentioned in the developer's own findings. Despite the recognition of these impacts, they have not been sufficiently integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be adversely affected. The failure to provide the complete dataset means the application does not present a comprehensive evidential basis for weighing benefits against harm.

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

The procedural implications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential standards of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate, failing to accurately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines, located close to the shoreline, would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the magnitude of visual change. The turbines' scale and proximity would dominate views from residential locations, historical sites, and popular coastal areas. This would have a direct effect on visual amenity, diminishing the core qualities of naturalness and remoteness. The assessment fails to adequately capture the significance of this impact, particularly given the sensitive nature of the landscape involved.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that these viewpoints might not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and landscapes of high value. This oversight raises concerns that the magnitude of visual impact has been understated, consequently compromising the assessment's reliability.

Additionally, there is a failure to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment considers these sites in isolation rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and breaking their connection to the natural horizon. This represents not only a visual detriment but also a wider cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The anticipated scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further diminishes any assertions of policy adherence.

It is evident that the identified impacts cannot be mitigated effectively. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Thus, the resulting change is fundamental and permanent, rendering any potential for mitigation to an acceptable level unlikely.

Collectively, the assessment does not accurately depict the scale of the impact, the environment's sensitivity, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The proposal concerning the waters off the West Lewis coast is fundamentally flawed, as it neglects to provide a thorough assessment of fisheries and marine life. This area is home to a rich marine ecosystem and supports an active fishing industry, yet the application fails to show how these vital uses and habitats will be safeguarded from significant disruption.

A major concern lies in the unfounded assumption that fishing activities can simply be displaced without adverse effects. There is no evidence presented that alternative fishing grounds are available, accessible, or able to accommodate increased pressure from displaced fishing efforts. This lack of information is critical, as such displacement could lead to overfishing in other areas and would have broader economic repercussions for the local fishing fleet. Without a clear, evidence-backed evaluation, the implications for fisheries and local livelihoods remain vague and concerning.

Moreover, the application raises significant risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over a prolonged period is likely to disturb marine life across large distances, notably impacting species such as dolphins. The projected disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

The document also exhibits glaring contradictions; it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously stating that the anticipated impacts are negligible. This inconsistency severely undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, particularly when harm is expected to an extent that necessitates legal authorisation.

Furthermore, the assessment lacks consideration of cumulative impacts stemming from various pressures such as habitat disruption, noise pollution, and the displacement of fishing activities. Without an all-encompassing evaluation of these combined effects, it is impossible to accurately ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It fails to prove that the development can coexist with current marine users or avoid unacceptable repercussions on marine biodiversity, which hinders any determination that the proposal aligns with sustainable development principles.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions throughout the application culminate in an incomplete and unreliable assessment. These shortcomings impede 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 integral to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment omits any assessment of dark skies and nocturnal wildlife, representing a significant gap in the analysis. The proposed introduction of permanent red aviation lighting would create a continuous "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the area's identity and to emerging tourism sectors such as astro-tourism, this omission is crucial. The absence of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and the risk of increased mortality have not been evaluated.

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

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

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

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

TOURISM

The application acknowledges that 86% of visitors are drawn by scenery. However, it does not provide a quantified assessment of how large-scale offshore infrastructure

would influence visitor numbers or overall economic contributions. The assessment of tourism impacts is materially deficient, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is fundamentally dependent on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this significant increase, the application neglects to model how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the region. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely impact this established and growing sector.

Additionally, the assessment overlooks the vital role of environmental quality in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experience, as well as emerging markets such as nature-based tourism and astro-tourism, are not addressed. The absence of a Dark Skies Assessment further exacerbates this oversight, creating a significant gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

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

The collective failure to quantify tourism impacts, assess environmental drivers of visitor behaviour, and consider the island's economic dependency results in a considerable evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant misalignment with the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application mirrors 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 put forward under an enhanced policy framework that prioritises biodiversity, peatland conservation,

landscape preservation, and the wellbeing of communities, the application falls short in critical areas.

A reliable and complete evidential basis for decision-making is lacking. There are notable gaps in baseline data, and the continued reliance on an undefined design envelope poses additional concerns. Furthermore, it depends on unspecified mitigation measures and fails to consider important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of likely significant effects and residual impacts.

In addition to these substantive issues, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the lack of a comprehensive Social Impact Assessment represents a material omission that hinders a proper evaluation of impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies are significant enough to deem the application unsuitable for determination.

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

Environmental risks associated with this proposal remain uncertain and potentially serious. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and making it impossible to lawfully conclude that the impacts are acceptable.

Moreover, the proposal threatens to create substantial and irreversible alterations to a notably sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the negative impact on tourism represent permanent changes that cannot be adequately mitigated.

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

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

Additional Comments

I am an amateur artist and animal lover. I enjoy travel and being from the Isle of Lewis is one of my favourite ways to introduce myself.our Islands scenery is world renowned. W have so much on our doorstep by way of wildlife (a vast amount seabirds and mamals). Please please reconsider this as there is no going back once started. Our wildlife will lose us as we lose them making the Islands lose their unspoilt beauty that has spanned over thousands of years. We have business here that may be affected in long term. Artists, leasure and recreation, tourism. The ist goes on. Please listen as we plead to be heard. Remember..no undoing this once its done. The Island as we know it will be gone.



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: 581559FD

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from a detailed examination of the Environmental Impact Assessment Report and associated documents, pinpointing critical deficiencies across planning, environmental, cultural, and procedural dimensions. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely untouched environment, and rich cultural heritage. Concerns are raised about the scale, proximity, and design of the proposed development, which challenge its alignment with statutory obligations, national policy directives, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful assessment. It omits crucial environmental data, presents limited and inconsistent baseline information, and leaves significant components of the proposal undefined. The implementation of a flexible design framework obscures the assessment of likely significant effects, and the dependence on unarticulated mitigation measures hampers any evaluation of their potential effectiveness. Consequently, the information provided fails to facilitate a comprehensive understanding of the environmental, cultural, or community repercussions, and assertions of negligible or insignificant impacts lack robust supporting evidence.

Furthermore, clear and considerable policy discrepancies have emerged. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for biodiversity protection, climate considerations, and environmental integrity. These inconsistencies relate directly to the statutory tests necessary for consent and jeopardise the ability of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of this proposal raises additional concerns, as large turbines are set to be positioned in close proximity to the shoreline, provoking substantial issues regarding landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, weaknesses in evidence, and evident non-compliance with policy guidelines indicate that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, it is imperative that the precautionary principle be enforced.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a comprehensive, transparent account of the likely environmental impacts of the proposal. The flexible Project Design Envelope approach, which does not commit to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario and undermines the assessment's integrity, preventing both the public and the relevant authorities from fully understanding the true environmental implications of the development.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

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

assess, and select less harmful options in favour of more damaging solutions is a significant shortcoming.

There is no clear comparison of alternative offshore locations, development scales, or design configurations. The developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impacts highlight the critical nature of this analysis, and its absence raises doubts about whether the proposed siting is indeed the least damaging option.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment conducted regarding marine ecology and protected species demonstrates significant deficiencies and fails to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine system. However, the baseline data collected is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat usage. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

Notably, the application omits crucial information related to otters, which are classified as a European Protected Species. It does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns undermines any conclusions drawn

regarding the potential effects of construction disturbance, noise, and increased activity, leading to an inadequate assessment of significant effects on this species.

Furthermore, the evaluation of basking sharks is similarly flawed. The reliance on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions, which is likely to result in an underestimation of their presence. This issue is particularly pronounced when compared to established land-based observations that indicate frequent usage of these waters. The omission of such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings imply that conclusions asserting negligible or non-significant effects are based more on assumptions rather than robust evidence. The lack of sufficient baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species involved. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, the granting of consent cannot be deemed lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately leading to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

crucial feeding grounds are not thoroughly considered, and the reliance on modelling approaches adds uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies employed appear to underestimate mortality rates, compounded by incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents another serious risk, as it creates a barrier along a primary flight path that species use when travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately evaluated, nor are the potential effects on species with smaller global populations considered. From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby undermining the validity of any conclusions drawn in favour of consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is acknowledged as a living cultural landscape, where the interplay of environment, language, tradition, and community is essential. However, the application fails to recognise this interconnectedness, instead treating cultural heritage as a collection of static assets devoid of their dynamic social, cultural, and spiritual roles within the community. This reductive approach leads to a significant oversight regarding culturally significant sites, particularly the active burial and spiritual sites at Dalmore, Bragar, and Barvas. The assessment inaccurately categorises these places as static features, neglecting their continued use and the implications of development on their surroundings, which skews the evaluation of cultural effects and disregards their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment, is not addressed in the assessment. These vital elements contribute significantly to the area's identity, yet their absence represents a considerable oversight. The failure to incorporate these aspects limits the understanding of the true cultural impact of the proposed development.

Community rights and engagement are also central to this issue. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted in a manner that reflects the principles of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established practices in matters affecting cultural and environmental interests.

A critical procedural shortcoming is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, especially regarding the protection of historic assets and spaces. The disregard for both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from required policy standards.

In summary, the lack of assessment of living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately addressed, and the application fails to establish a sufficient basis for understanding the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is alarming and raises serious concerns. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission hinders both public understanding and the ability of the competent authority to grasp the full extent of the social risks that have been identified through the developer's research.

Residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are not merely speculative. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings highlighting a risk of "cultural loss." Despite this, the impacts have not been adequately integrated into the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency critically undermines the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, especially where community character and functioning could be jeopardised. Without the complete dataset, the application fails to provide an adequate evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must enhance positive health outcomes and mitigate harm; yet the available evidence points to existing adverse effects that remain undisclosed. The absence of the complete assessment makes it impossible to demonstrate compliance with this policy.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission represents a critical flaw within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture the extent of change and the sensitivity of the environment. Notably, the West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The planned installation of large-scale turbines near the shoreline would introduce an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The assessment does not sufficiently represent the magnitude of the anticipated visual changes. Due to the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would severely impact visual amenity and diminish the defining characteristics of naturalness and remoteness. Moreover, the assessment fails to adequately convey the level of impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology employed in the selection and presentation of visual viewpoints. There is evidence to suggest that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been

underestimated, thereby compromising the reliability of the assessment.

A critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, connected through visual and spatial relationships to the Atlantic horizon. The assessment mistakenly treats these as isolated assets, neglecting their interdependence and resulting in 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 change represents not only a visual impact but also a broader cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal contravenes the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The degree of change proposed is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment fails to accurately represent the scale of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent, which hinders a thorough evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures, especially 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 sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to granting consent, and the absence of such crucial information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application under consideration lacks a robust evaluation of the ecological and socio-economic impacts associated with the proposed development. It does not adequately demonstrate that these vital habitats and activities can be preserved without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure from displaced fishing efforts. This is a critical oversight, as such displacement could lead to overfishing in other areas, potentially resulting in severe economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise from construction activities. The use of high-energy hammer piling over an extended timeframe is anticipated to disturb marine life over large distances, with particular concern for species such as dolphins. The expected disturbance to a

significant portion of the local bottlenose dolphin population raises alarming questions, yet the application tends to minimise the importance of these effects, lacking sufficient supporting evidence.

The application also presents an inconsistency regarding the necessity for licences to permit harm to European Protected Species, acknowledging the need while simultaneously describing the impacts as negligible. This contradiction raises doubts about the credibility of the assessment and brings to light serious compliance issues with the Habitats Regulations, especially when harm is expected to necessitate legal authorisation.

Furthermore, the assessment overlooks the cumulative impacts of various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to align with the principles outlined in National Planning Framework 4 and the National Marine Plan. It does not adequately demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity. This prevents any conclusion that the proposal is a model of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking and does not account for the full range of impacts associated with this integrated project. The offshore turbines and the associated onshore works are fundamentally interconnected, yet they are evaluated in isolation, leading to a disjointed analysis that fails to reveal the true magnitude of environmental and socio-economic repercussions.

Included in the onshore components are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By neglecting to address or postponing the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated

collectively; however, the disconnection between the offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are notable risks posed to sensitive habitats, such as machair systems and peatland environments that are under policy protection. The application does not provide sufficient evidence that the impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

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

From a policy standpoint, the failure to evaluate the project as an entirety and to demonstrate the safeguarding 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 weakens the application further.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment is a significant omission that raises serious concerns. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining the environmental quality, cultural identity, and tourism potential of the area. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is especially critical as dark skies contribute to the identity of the area and are increasingly important for emerging tourism sectors such as astro-tourism. The absence of this assessment reveals a glaring gap in the overall landscape and environmental evaluation.

Equally concerning is the lack of consideration for nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collisions. The proposal does not include any assessment of the

lighting's impact or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and their mortality rates.

The deficiencies in the ornithological assessment are compounded by the reliance on daytime survey data, which fails to account for nocturnal behaviours and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

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

Moreover, this omission conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality, undermining the overall assessment of landscape and seascape impacts. Night-time character is an integral aspect of the environment that has not been sufficiently addressed.

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

TOURISM

The application acknowledges that 86% of visitors are attracted to the Isle of Lewis due to its scenery. However, it fails to provide a quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contribution of tourism. This oversight is critical, given that tourism plays a significant role in the local economy, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

In addition, the role of environmental quality is not addressed, specifically regarding unspoiled landscapes and dark skies, which are crucial to visitor experience and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised and growing sector of the local economy.

The implications extend beyond just tourism; in an island community with limited economic diversification, the lack of a comprehensive assessment of tourism impacts raises concerns for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been evaluated.

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

Overall, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This shortcoming hampers a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is characterised by significant inadequacies that undermine its compliance with the principles of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application echoes the central issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to address these critical concerns.

A thorough examination reveals that the application lacks a comprehensive and reliable evidential foundation necessary for determination. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a clear understanding of potential significant effects or residual impacts.

Moreover, procedural failures are evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment constitutes a significant omission, hindering the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal also conflicts with the National Planning Framework 4, as it does not

adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals exhibit internal inconsistencies. The evidential threshold necessary to definitively rule out adverse effects has not been met, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to substantial and irreversible alterations to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, deterioration of dark skies, disruption of cultural and visual connections, and negative impacts on tourism signify permanent changes that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is essential that the competent authority either refuse consent on these grounds or activate the relevant regulatory provisions to compel 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

As a regular visitor to the islands I go there for the the beautiful scenery and the nature photography I also enjoy spending time walking along the beaches and heritage sites. I strongly object to the the wind farm and it's impact that this wind farm would have on them and the people and wildlife who's lives would be affected by them.

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: 68E17B69

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The project 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 arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks a sufficient evidential basis for a lawful determination. Critical environmental data is missing, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The adoption of a flexible design framework complicates the understanding of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation does not provide a comprehensive or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear conflicts with established policy. 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 fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are planned to be located in close proximity to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and insufficient for lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or reliable account of the environmental impacts associated with the proposal. The report's reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the integrity of the assessment and obscures the actual environmental impacts of the proposed development, making it difficult for the public and the competent authority to understand the true extent of these effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Seeking consent based on the assumption that environmental harm will be addressed later obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Moreover, there are serious evidential deficiencies present, such as gaps in baseline data, limitations in methodology, and an overreliance 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 made without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not comply with statutory requirements.

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

Overall, the combination of an undefined design envelope, lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the proposed development is seriously flawed. It does not offer a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is lacking. The methods employed do not adequately capture the presence, behaviour, or habitat use

of species in the region. Consequently, the assessment fails to provide a sound basis for evaluating the potential impacts of the project.

There is a significant oversight concerning otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behaviour means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines any conclusions about the absence of significant effects on this species.

The assessment also falls short in evaluating basking sharks. The reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The omission of such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been appropriately identified or assessed. The uncertainty introduced by these deficiencies prevents the conclusion of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be lawful.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static assets, without recognising their ongoing social, cultural, and spiritual significance.

within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to acknowledge the impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

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

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when there is potential for disruption to community

character and functioning. The developer's decision not to disclose the full dataset means that the application does not provide a complete evidential basis for evaluating the balance between benefits and harm.

Evidence suggests that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, which are based on direct engagement with the community, are not speculative. Nonetheless, the failure to make the full assessment available prevents proper scrutiny of these findings and diminishes the ability to assess their significance within the decision-making framework.

Moreover, the proposal has been viewed as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of “cultural loss.” However, these implications have not been adequately incorporated into the primary application, nor have they been accorded the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm; however, the evidence at hand suggests existing negative effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural consequences of this omission are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of access to the complete Social Impact Assessment. This represents a significant gap within the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped, remote character. The introduction of large-scale turbines near the shoreline would create a continuous and dominant 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, failing to adequately represent the magnitude of this visual change. The proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and sense of remoteness that defines this area.

There are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valued landscapes. This raises the risk that the visual impact has been understated, thereby undermining the reliability of the assessment. Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon, but the assessment treats them as isolated assets, failing to acknowledge their interdependence and resulting in an incomplete evaluation of impacts on their cultural significance and setting.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been adequately assessed in the application. From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation. Overall, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, which prevents a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of environmental risks related to construction and pollution is inadequate, lacking the necessary details to properly evaluate potential impacts. The proposed works involve significant seabed preparation and installation in a high-energy Atlantic setting, yet the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on future mitigation and contingency measures that will be established after consent, which hinders any meaningful assessment of their potential effectiveness or adequacy.

This dependence on undefined future measures is particularly alarming given the delicate nature of the environment in question. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it falls short in detailing the methods for preventing, controlling, or monitoring these threats.

Furthermore, there is considerable uncertainty regarding the magnitude and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The absence of rigorous modelling and clearly delineated management strategies makes it impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the potential effects on sensitive marine species and habitats that have already been identified in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces a significant procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation measures must occur prior to consent, and the absence of this information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy mandates concerning environmental protection and water quality.

In conclusion, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer

piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with 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 avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a complete assessment of the onshore infrastructure, failing to consider the full range of impacts from this integrated project. It treats the offshore turbines and onshore works as separate entities, leading to a fragmented evaluation that obscures the overall environmental and socio-economic effects.

Key onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts prevents a clear understanding of the project's environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are examined together, yet the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks also exist for sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a clear gap in evidence regarding biodiversity protection.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence that necessary consents or processes have been initiated, raising concerns about the project's deliverability and lawful implementation.

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

In summary, the division of project components, the lack of a comprehensive assessment, and insufficient evidence on environmental and land use impacts make this section of the application incomplete and unreliable, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal's failure to assess the impact of artificial lighting on nocturnal wildlife and dark skies represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. However, the introduction of permanent red aviation lighting will create a continuous and intrusive effect across the western horizon, fundamentally altering the night-time environment and the visual amenity enjoyed by both residents and visitors.

Moreover, there is no evaluation of how this lighting may impact species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are sensitive to artificial lighting. These species can experience disorientation and increased collision risk due to phototaxis. The lack of a lighting impact assessment or phototaxis study fails to address these crucial ecological concerns. Additionally, the reliance on daytime survey data in the ornithological assessment does not account for nocturnal activities, leaving vulnerable species like Kittiwakes at risk from artificial lighting during their foraging or migration at night.

Without thorough assessments of nocturnal impacts, it remains unclear whether protected species or designated sites may suffer adverse effects. The evidential standard required to rule out negative impacts beyond reasonable scientific doubt is not met, invoking the precautionary principle and impeding a lawful determination. From a policy perspective, this omission is inconsistent with the National Planning Framework 4 regarding the protection of natural places and environmental quality,

undermining the overall assessment of landscape and seascape impacts.

In summary, the lack of baseline data, impact modelling, and species-specific analysis regarding dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination. This significant evidential gap must be addressed to ensure a comprehensive understanding of the potential consequences.

TOURISM

The proposal for large-scale offshore infrastructure significantly overlooks the assessment of tourism impacts, failing to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is inherently tied to the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how such development would influence visitor numbers, behaviour, or the economic contribution of tourism.

Since 2017, tourism has seen considerable growth, with its value rising from £65 million to over £81.5 million. This sector now supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Despite these figures, the application fails to model the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains impossible to ascertain whether the development would result in a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects to address the critical role of environmental quality in enhancing the tourism experience, particularly regarding the significance of unspoiled landscapes and dark skies for visitors. Emerging markets, such as nature-based tourism and astro-tourism, rely heavily on these factors. The lack of a Dark Skies Assessment exacerbates this shortfall, leaving a considerable gap in understanding the impacts on a recognised and growing part of the local economy.

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

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers affecting visitor behaviour, and consider the economic dependency of the island

culminates in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects, reinforcing the notion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now put forward under a policy framework that places heightened emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided in the application is both incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and there is a reliance on unspecified mitigation measures. Furthermore, important impact pathways are omitted, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedural failings are also evident. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a notable omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the principles laid out in National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural spaces, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot evidence a net economic benefit due to the lack of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been adequately assessed, masking effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistently documented. The requisite evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and prevents a lawful conclusion that the impacts are acceptable.

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

Taken as a whole, the application is procedurally and substantively inadequate for determination. The numerous information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Economic suicide if this goes ahead, the final blow after the ferries to kill tourism on the Isle of Lewis. Zero benefit to the islands just to line the pockets of greedy foreign multinational companies.

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: F7C6B473

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

Dear Sir/Madam

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

Critical deficiencies are evident in the application, as it lacks an adequate evidential basis for a lawful determination. There are significant gaps in environmental data, and the available baseline information is both limited and inconsistent. Several key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. Additionally, the reliance on unspecified mitigation measures prevents a proper assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are also clear and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal as acceptable from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or reliable overview of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope,

lacking definitive commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hampers a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from grasping the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As such, consent is sought with the understanding that any environmental harm will be addressed subsequently. This approach obstructs a meaningful evaluation of the effectiveness of these measures and an assessment of residual impacts. Deferring key information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigation be clearly established before any determination is made.

Moreover, there are notable evidential deficiencies, such as gaps in 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 offered without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is not evidenced that impacts have been fully assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation measures, and the existing gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies hinder a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application inadequately addresses the assessment of alternatives, failing to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of presenting a coherent and reasoned comparison of feasible alternatives based on their environmental impacts, it offers a narrative detailing the project's evolution. This method does not effectively illustrate that less harmful options

have been properly identified, evaluated, and preferred over more damaging choices.

Furthermore, there is a lack of transparent and evidence-based comparisons regarding alternative offshore sites, varying development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered the potential for turbine placement further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to the shore in determining impact necessitate such analysis; without it, there is no basis for concluding that the proposed siting is the least damaging option.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not effectively capture essential details about species presence, behaviour, and habitat use, leading to a lack of sound evidential basis for evaluating potential impacts.

Of particular concern is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an insufficient assessment

of the potential effects stemming from construction disturbance, noise, and increased activity. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys, which introduces considerable detection bias, particularly in Atlantic conditions. This approach is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The omission of such data contributes to an incomplete baseline, further weakening the reliability of the conclusions reached.

The methodological limitations present mean that any assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This creates a level of uncertainty regarding the genuine scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application demonstrates significant deficiencies, ultimately leading to an unreliable conclusion regarding its environmental impact. A critical area of concern is the presence of contradictory findings within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which should only arise in situations where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the assessment and suggests that the findings do not have a solid evidential foundation.

Additionally, the ornithological assessment contains major gaps in evidence, particularly in relation to the seabird populations that inhabit the west coast of the Isle of Lewis. This area is home to internationally important seabird species, many of which are already in decline. The application fails to convincingly demonstrate that these species will remain unaffected, particularly concerning the key foraging areas and

migratory pathways where the development is sited. The implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application fails to adequately address 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 closely interconnected. Rather than recognising this dynamic relationship, the application adopts a narrow perspective that reduces heritage to a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practices; however, they are mischaracterised as static features in the assessment. This oversight fails to take into account their

continued use and importance, as well as the potential impacts of development on their settings. As a result, the evaluation of cultural effects is incomplete, neglecting their vital role in community life.

Additionally, the application overlooks crucial aspects of 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 elements are fundamental to the identity of the area but are glaringly absent from the assessment. Ignoring these factors compromises the understanding of the cultural impact of the proposed development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population holds a unique cultural identity, recognised as having characteristics of an Indigenous People. However, the application lacks a process of Free, Prior and Informed Consent, which diminishes the credibility of the assessment and fails to adhere to established principles of meaningful participation in decisions that affect cultural and environmental interests.

Moreover, a significant procedural failure is highlighted by the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community. This omission alone raises questions about the lawfulness of the determination process.

From a policy perspective, these deficiencies directly conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, illustrates a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and compliance with statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted lacks transparency and comprehensiveness. A Social Impact Assessment was commissioned by the developer, which included focus group discussions with local residents. However, the absence of the full report creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to assess the potential social risks identified through this research.

Available summaries suggest that the local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts arise from direct engagement with the community, indicating that they are based on actual experiences rather than speculation. Nevertheless, the failure to publish the complete assessment prevents a thorough examination of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to the community's identity and cohesion, with a "cultural loss" noted in the developer's own findings. Despite acknowledging these impacts, they have not been adequately incorporated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency further undermines the Environmental Impact Assessment process. An in-depth understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential foundation for weighing benefits against potential harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates adverse effects that have not been fully acknowledged. Without the full assessment, demonstrating compliance with this policy is not feasible.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a significant gap within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

character and leading to a permanent transformation of the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbance and contamination. The proposed development involves significant seabed preparation and installation works in a challenging Atlantic environment. However, the assessment of construction and pollution risks lacks the necessary detail to effectively evaluate potential environmental impacts. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, which undermines any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming given the fragile nature of the receiving environment. The application notes the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to detail how these risks will be prevented, controlled, or monitored. There is also a lack of clarity concerning the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts, including those on already identified sensitive marine species and habitats.

Moreover, the absence of well-defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and limits the ability of the competent authority to properly assess environmental protection measures before a decision is made.

From a regulatory standpoint, the failure to establish essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and necessary mitigation must be evaluated before consent is granted, and the absence of such information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and certainty regarding potential impacts results in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is inadequate, failing to adequately address the ecological and socio-economic repercussions. The coastal waters off West Lewis are home to a diverse marine ecosystem and support a thriving fishing industry. However, the application does not convincingly demonstrate that these vital habitats and activities can be preserved or sustained without significant disruption.

A significant concern is the assumption that displacing fishing operations will not have repercussions. The documentation lacks evidence regarding the availability, accessibility, and capability of alternative fishing grounds to manage increased pressure. This gap is crucial as it raises the risk of overfishing in other areas, potentially leading to broader economic challenges for the local fishing fleet. Without a thorough and evidence-based evaluation, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disrupt marine life across extensive distances, impacting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is particularly concerning; however, the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency in the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions regarding adherence to the Habitats Regulations, especially in situations where harm is expected to reach a level that requires legal approval.

Additionally, the assessment does not adequately address the cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough analysis of these combined influences, it is impossible to ascertain the overall effects on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can harmonise with current marine users or evade unacceptable consequences for marine biodiversity, thus obstructing any assertion that the proposal aligns with sustainable development principles.

In summary, the deficiencies related to the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application culminate in an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure fails to account for the full range of impacts associated with this single integrated project. The intrinsic linkage between the offshore turbines and onshore works results in an assessment that is fragmented,

thereby obscuring the true scale of environmental and socio-economic effects.

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

Furthermore, by omitting or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be examined collectively; however, the distinct treatment of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to protective policies. The application does not substantiate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented, leading to an evidential gap regarding biodiversity protection.

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

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or processes have been commenced, raising questions about deliverability and lawful implementation.

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

Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western

horizon. This alteration fundamentally affects the night-time environment of the West Lewis coastline, which is distinguished by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and to emerging tourism sectors, such as astro-tourism, this omission is significant and results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to assess how aviation lighting may affect these species or potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the risk remains unassessed. The absence of site-specific night-time data presents a critical gap in understanding ecological impacts.

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

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

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

TOURISM

The assessment regarding tourism impacts is severely inadequate and does not adequately evaluate the economic and social repercussions for a crucial part of the Isle of Lewis's economy. The island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital to tourism, which thrives on these natural attributes. The application recognises that 86% of visitors are attracted by the scenery, yet it neglects to provide a quantified analysis of how large-scale offshore infrastructure

might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, while also supporting over 1,000 jobs and making up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

The assessment further neglects to recognise the crucial role of environmental quality in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor satisfaction and the growth of niche markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this deficiency, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the island community's limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a significant evidential gap. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

The evidential basis for the application remains incomplete and unreliable. There are crucial gaps in the baseline data, the design envelope remains undefined, and reliance

on unspecified mitigation measures raises significant concerns. Key impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment lacks completeness, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory obligation under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant omission, limiting the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, thus rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to discount 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 lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and detrimental impacts on tourism are permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory provisions to mandate the submission of the outstanding information.

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

Additional Comments

The heavy plant brought onto the island probably broke our ferry a few weeks back, its not built for this type of machinery. U say the arrow is supposed to be taking over heavy

plant, lies already and we haven't even started.

Plant and work force are already taking priority over necessities on the island. Locals, family coming home to visit and tourists.

Peat has the consistency of milk, u want to build all these turbines on a land built on something as stable as sand. Look what happened in Ireland. Slid into the sea.

As soon as we had sonar drilling we had a mass whale beaching, please dont tell be sonar does not affect marine animals.

Turbines chop up wildlife, dont mind a few sea eagles but its kind of illegal to kill them.

As a someone who fishes, crofts and runs a local buisness, the impact is very negative from all angles. As a crofter i signed an agreement to let the hydro improve the structure on the common grazing, hoodwinked into signing what I thought would benefit the whole island. I do not agree with upgrading for windfall, sea or land!

Gov say the folk who have most info structure will get highest bills, yup we're getting more than our fair share so bills will be higher but we're powering mainland. How does that figure.

No one has asked our health board, schools, services if we can cope with the influx of more workers.

Since i was 20 years old, thus project was supposed to be about harnessing the island for natural power, wind wave, from butt to barra, we objected then, I object now!

Ur spoiling our landscape, everything that we are, our peace and quiet. We've been sold to foreign companies. Scotland will not benefit.

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: 25E26FAF

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, it is evident that there are significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposed development, particularly its proximity to the shoreline, raise essential questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful decision. There are notable omissions of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

Furthermore, there are clear and significant conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts are pivotal to the statutory tests necessary for consent and hinder the ability of the competent authority to determine the development's acceptability in terms of policy.

The unprecedented scale of this proposal in this location, combined with the placement of large turbines in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. Taken collectively, the absence of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and insufficient for lawful consideration. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

Additionally, the report suffers from substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be evidenced that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is essential under the Environmental Impact Assessment regime. Instead of a thorough analysis of environmental effects, it offers a narrative of project evolution. This approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

Moreover, there is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, coupled with the crucial role of proximity to shore in assessing impact, highlights the significance of this omission. Without such analysis, it cannot be concluded that the proposed siting represents the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design measures.

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

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment lacks the necessary completeness and reliability to fully understand the ecological receptors present in the West Lewis coastal environment. This region is both sensitive and biologically active; however, the baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Among the critical shortcomings is the insufficient recognition and assessment of otters, a European Protected Species, which actively utilise coastal areas for foraging and movement. The assessment neglects to account for their core foraging range and behavioural patterns, leading to an inadequate evaluation of how construction disturbance, noise, and increased activity might affect them. This significant omission undermines any conclusions regarding the lack of considerable effects on the species.

Additionally, there are notable deficiencies in the assessment of basking sharks, with the reliance on aerial surveys creating a substantial detection bias, particularly under Atlantic conditions. This methodological choice is likely to lead to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations highlighted result in a reliance on assumptions rather than sound evidence, particularly regarding conclusions of negligible or non-significant effects. Furthermore, the absence of comprehensive baseline data hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or National Planning Framework 4, as it has not adequately identified or assessed the protected species present. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to provide sufficient evidence that internationally important seabird populations, including those associated with protected sites like the Lewis Peatlands and St Kilda, will not be adversely affected. The west coast of the Isle of Lewis is home to many seabird species that are already in decline, yet the assessment does not robustly demonstrate, to the necessary evidential standard, that these species will be safeguarded. The reliance on modelling approaches, particularly for species in severe decline such as Kittiwakes and Fulmars, introduces uncertainty. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and the behavioural responses of these birds are not fully understood.

Significantly, the siting of turbines within a recognised migratory corridor poses an additional risk by creating a barrier within a primary flight path utilised by species travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations. The shortcomings in the assessment raise serious concerns about the

reliability of the conclusions drawn.

A fundamental contradiction within the application sees the developer asserting that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency undermines the validity of the assessment and indicates that the conclusions presented do not align with the evidence that supports them.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies illustrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Taken as a whole, the assessment is unreliable, marred by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These flaws preclude a thorough evaluation of the impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the planning application inadequately addresses the cultural heritage and identity of the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application treats heritage as a collection of static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is seen in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are places of active burial and spiritual practice, yet the assessment reduces them to static features, ignoring their continued use and significance. This mischaracterisation leads to an incomplete evaluation of cultural impacts and neglects their importance in community life.

Moreover, the application does not assess 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 crucial to the area's identity, but they are missing from the assessment, which is a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of

meaningful engagement undermines the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a 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 is enough to prevent a lawful determination.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the recognition of living cultural practices, represents a clear departure from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not adequately support an assessment of the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing related to the proposed development have not been adequately assessed, revealing a lack of transparency that is crucial for a lawful evaluation. Although the developer conducted a Social Impact Assessment which involved focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of “cultural loss.” Nonetheless, these social impacts have not been adequately incorporated into the main application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this magnitude, especially when community

character and functioning could be at stake. Without the complete dataset, the application does not provide a thorough evidential foundation for evaluating the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals are expected to foster positive health outcomes and avoid harm; however, available evidence suggests existing negative effects that have not been fully revealed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural consequences are considerable. The competent authority is unable to perform a robust evaluation of socio-economic and health implications due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation incomplete and unreliable. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing

Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial detriment that has not been adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The concerns surrounding the proposal stem from an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, which prevents any meaningful assessment of their potential adequacy or effectiveness.

This reliance on undefined future measures is especially alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats vulnerable to sediment disruption and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not furnish adequate detail on the prevention, control, or monitoring of these threats.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without rigorous

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate measures are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the determination stage.

Regulatory requirements highlight that the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime. It is crucial that likely significant effects and mitigation strategies be assessed before consent is granted, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy stipulations pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and does not deliver a thorough evaluation of ecological or socio-economic impacts. The area off the West Lewis coast is home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not sufficiently demonstrate that these critical habitats and uses can be preserved or maintained without considerable disruption.

A notable issue is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate additional pressure. This gap is critical, as such displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-backed assessment, understanding the implications for fisheries and local livelihoods remains elusive.

Moreover, the proposed development poses considerable risks to marine species, especially due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged duration is expected to create disturbances over extensive distances, impacting species such as dolphins. The predicted effects on a notable portion of the local bottlenose dolphin population raise significant issues, yet the application tends to underestimate these impacts without

adequate supporting evidence.

Inconsistencies are evident within the application itself, where it acknowledges the necessity of licences to allow harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that mandates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

When viewed collectively, the deficiencies in the assessment regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the evaluation incomplete and unreliable. These shortcomings hinder a thorough assessment of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a significant challenge due to its fragmented assessment of onshore infrastructure, which is insufficient and does not account for the entirety of impacts associated with the integrated project. The offshore turbines and onshore works are interdependent, yet they are evaluated in isolation, leading to an incomplete understanding of the environmental and socio-economic consequences of the project.

Key onshore elements of the proposal encompass cabling that crosses protected moorland, the construction of a substation close to Stornoway, and the creation of access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, an important carbon store and ecologically significant habitat. The lack of a thorough assessment regarding these impacts results in an inadequate comprehension of the project's overall environmental footprint.

This omission of onshore impact assessments prevents a proper evaluation of cumulative effects, as the Environmental Impact Assessment process mandates that all project components be considered collectively. The disjointed analysis of offshore and onshore elements obscures the understanding of combined impacts on peatlands, habitats, and local communities.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to establish that impacts on these critical habitats have been thoroughly evaluated or that adequate avoidance measures have been incorporated. This situation leads to a significant evidential gap concerning biodiversity protection.

Concerns also arise around the project's carbon balance. The disruption of peatland can release sequestered carbon, which might create a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or confirm that the overall carbon balance remains advantageous.

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

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

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts culminate in an incomplete and unreliable application, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The exceptionally dark skies along the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism value. The proposal includes the introduction of permanent red aviation lighting, which would be visible over considerable distances, thereby creating a continuous and intrusive "wall of light" across the western horizon that fundamentally alters 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 oversight is particularly significant in light of the importance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these impacts reflects a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a critical lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can

lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately assess how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposal.

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

In terms of policy, this omission contravenes the National Planning Framework 4, particularly regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

TOURISM

The proposal for large-scale offshore infrastructure lacks a comprehensive assessment of its tourism impacts, which is essential given the importance of this sector to the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to quantify how the proposed developments would influence visitor numbers, behaviour, or their overall economic contribution.

Tourism on the Isle of Lewis has seen significant growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the proposal does not analyse how the industrialisation of the seascape and potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without such an analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects the significance of environmental quality in enhancing the tourism experience, especially regarding the preservation of unspoiled landscapes and dark skies. This oversight is especially critical for emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the potential impacts on this growing aspect of the local economy.

In an island community characterised by limited economic diversification, the neglect of tourism impact assessments holds broader implications for employment, local enterprises, and the sustainability of the community. The absence of an appropriate Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated in line with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impacts and the necessity to illustrate net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the economic dependencies of the island culminate in a significant evidential gap. This inadequacy hinders a thorough 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 fails to meet the necessary standards for sustainable development as dictated by statutory duties and national policy. This proposal mirrors the fundamental issues that led to the rejection of the Lewis Wind Power application in 2008, which was deemed unacceptable due to the excessive scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

It lacks a comprehensive and reliable evidential basis for assessment. Key gaps in baseline data and an undefined design envelope are significant concerns, compounded by the reliance on unspecified mitigation measures. Furthermore, crucial impact pathways—including nocturnal wildlife, full onshore infrastructure, and tourism effects—are notably absent from the assessment. This results in an Environmental Impact Assessment that is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings. The absence of a compliant Island Communities Impact Assessment violates statutory duties outlined in the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact

Assessment constitutes a significant omission. Such gaps inhibit the competent authority's ability to evaluate the potential effects on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

In addition, the proposal conflicts directly with the National Planning Framework 4, as it does not sufficiently safeguard biodiversity, natural landscapes, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are manageable and lacks evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of the offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounding environmental risks remains significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents lawful determination of the proposal's acceptability.

Moreover, the application would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the erosion of dark skies, disruption of cultural and visual connections, and negative implications for tourism present permanent effects that cannot be adequately mitigated.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 021B81BF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not give a clear or dependable account of the potential environmental impacts of the proposed development. There is significant uncertainty due to the use of a flexible Project Design Envelope, which avoids commitment to specific details such as turbine dimensions and layouts. This uncertainty hinders a consistent worst-case scenario analysis and compromises the overall integrity of the assessment. Consequently, the public and the competent authority are unable to grasp the full scope of the environmental effects that the project may cause.

The application depends heavily on mitigation strategies, monitoring plans, and management measures that have not been outlined. By seeking consent based on the promise that environmental damage will be mitigated later, the application prevents any thorough assessment of the effectiveness of these measures or consideration of residual impacts. This postponement of essential information until after consent is granted is unacceptable from a procedural standpoint and undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined before any decisions are made.

There are notable gaps in evidence, such as insufficient baseline data, methodological limitations, and a reliance on assumptions instead of solid, site-specific evidence. This lack of information creates uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficient detail leads to an unclear picture of cumulative and worst-case impacts and introduces scientific uncertainties that conflict with statutory requirements.

Therefore, the application does not fulfil the evidential standards set by the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation calls for the precautionary principle to be applied, particularly concerning protected species and vulnerable habitats. Moreover, the proposal does not satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active marine system that is highly sensitive. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete or reliable understanding of ecological receptors within this area. The baseline data remains incomplete, and the

methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. This inadequacy results in a lack of a sound evidential basis for evaluating potential impacts.

A significant shortcoming in the assessment pertains to otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. The core foraging range and behavioural patterns of otters have not been adequately considered, meaning that potential effects from construction disturbances, noise, and increased activity remain unassessed. Consequently, this oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces notable detection bias, particularly given the challenging Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological limitations evident in the assessment lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, granting consent cannot be justified in a lawful manner.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant methodological weaknesses and internal inconsistencies. It fails to provide adequate evidence that the internationally important seabird populations, which inhabit the west coast of the Isle of Lewis and are already in decline, will not be adversely affected. The turbines are situated within key foraging areas and migratory pathways, yet the

application does not thoroughly evaluate the risks of displacement, collision, or habitat loss for these species.

Moreover, there exists a fundamental contradiction in the application; the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious questions regarding the validity of the assessment's conclusions, which are not substantiated by the supporting evidence.

The assessment does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents additional risks, as it effectively forms a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term impacts of sustained mortality within this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which obstructs a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies demonstrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to prove that internationally important seabird populations will remain unharmed places the proposal in direct conflict with national policy.

In conclusion, the assessment's internal inconsistencies, methodological flaws, and lack of supporting evidence culminate in an unreliable evaluation of impacts, reinforcing that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of disconnected, static entities instead of recognising their ongoing social, cultural, and

spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the long-standing bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by

its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence suggests that certain viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

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

These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in its assessment of construction and pollution risks, leading to an incomplete understanding of potential environmental effects. It involves considerable seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on post-consent mitigation and contingency measures, which prevents any thorough evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on the prevention, control, or monitoring of these risks.

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

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the absence of such information means a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings obstruct a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a significant portion of the local bottlenose dolphin population; however, the application tends to downplay these effects without adequate supporting evidence.

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

Moreover, the application shows an inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, particularly when harm is anticipated to such a degree that it requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is fundamentally inadequate, failing to acknowledge the comprehensive impacts arising from what constitutes a single

integrated project. The connection between offshore turbines and onshore works is vital, yet they are evaluated in isolation, leading to a disjointed analysis that obscures the actual magnitude of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus hindering a comprehensive understanding of the project's overall environmental footprint.

By excluding or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be assessed collectively, but the division between offshore and onshore components results in an insufficient grasp of the combined repercussions on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have been initiated, casting doubt on the deliverability and legality of the implementation.

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

Overall, the fragmentation of project components, the lack of a comprehensive assessment, and the absence of supporting evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby impeding a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged within the application that 86% of visitors are attracted by scenery; however, there is no quantified assessment of how large-scale offshore infrastructure might influence visitor numbers,

behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this growth, the application neglects to model the potential impacts of industrialisation of the seascape and the loss of environmental quality on Tourism Gross Value Added or on the wider economic resilience of the community. Without such an analysis, it remains impossible to ascertain whether the proposed development would result in a net economic benefit or undermine an established and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in supporting tourism, including the significance of unspoiled landscapes and dark skies for enhancing visitor experience and for emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a notable gap in the understanding of impacts on a recognised and burgeoning part of the local economy.

In light of the island community's limited economic diversification, the failure to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit net benefit. Additionally, it conflicts with strategic objectives that identify tourism as a priority growth sector and falls short in providing sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency obstructs a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to comply with the principles of sustainable development as outlined by statutory duties and national policy. This application echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting this new proposal under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate the underlying issues.

Critical deficiencies in the evidential basis for assessment are evident. There are

notable gaps in baseline data, an undefined design envelope continues to be used, and unspecified mitigation measures are relied upon. Furthermore, key impact pathways—such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism—have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

Procedural shortcomings are also apparent. The lack of a compliant Island Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission that limits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling precludes evidence of net economic benefit. Moreover, the cumulative impacts of both offshore and onshore components have not been properly evaluated, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals lead to internal inconsistencies. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing lawful conclusions regarding the acceptability of impacts.

This proposal would result in 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 adverse effects on tourism represent permanent changes that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct the ability to reach a lawful, evidence-based decision. It is imperative that the competent authority refuses consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or utilises the relevant regulatory provisions to demand the submission of the missing information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A97955ED

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 fundamentally inadequate and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental repercussions of the proposal. The implementation of a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. Such a situation undermines the assessment's integrity and results in impacts that may not accurately represent the development that will ultimately be constructed. This deficiency precludes both the public and the competent authority from grasping the true extent of the environmental effects involved.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought on the premise that any environmental harm will be addressed subsequently, hindering any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly articulated before determination.

Additionally, there are significant evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These issues yield uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate conformity with National Planning Framework 4, especially with respect to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly evaluated or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The proposed project exhibits significant shortcomings in its assessment of alternatives, failing to meet the statutory requirements laid out by the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant shortcomings that undermine its reliability and the conclusions drawn within it. A considerable inconsistency exists, as the developer claims there will be no significant adverse effects while simultaneously pursuing a derogation case under the Habitats Regulations, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the validity of the assessment, suggesting that the findings are not substantiated by the available evidence.

The ornithological assessment is notably flawed, containing substantial gaps in evidence and internal inconsistencies. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in proximity to the proposed development, yet the assessment does not thoroughly consider the implications of displacement, collision risk, or habitat loss.

In relation to protected sites, the assessment does not convincingly show that seabird species associated with areas such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces a degree of uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality, particularly when baseline data is inadequate and behavioural responses are not entirely understood.

Moreover, the placement of turbines within a known migratory corridor poses an additional, substantial risk. This effectively creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold needed to affirm that there will be no adverse effect on the integrity of protected sites. The combination of conflicting conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

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

In summary, these weaknesses in methodology, evidence, and internal consistency render the assessment unreliable. These flaws hinder a thorough evaluation of impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the planning application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead of acknowledging these relationships, the application reduces heritage to a collection of isolated and static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

There is a notable inadequacy in the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment dismisses them as mere static features, failing to take into account their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts and ignores the integral role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the long-standing connection between the community and the coastal environment. These elements are essential to the area's identity but are entirely overlooked, representing a serious gap in the assessment. The absence of these considerations means that the cultural implications of the development cannot be comprehensively grasped.

Concerns also arise regarding community rights and the process of engagement. The Gaelic-speaking population, which embodies distinct characteristics akin to those of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not align with recognised principles of participation in matters impacting cultural and environmental interests.

A significant procedural shortcoming is the failure to produce a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community. This deficiency alone renders the determination process unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, indicates a clear deviation from policy mandates.

When considered collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and legal requirements create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to furnish a sound basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a significant concern that compromises the integrity of the evaluation process. While the developer engaged local residents through focus groups as part of this assessment, the full report remains unpublished, leading to a critical evidential gap. This omission prevents both

the public and the competent authority from fully grasping the social risks that have been identified in the developer's own research.

Furthermore, existing evidence reveals that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are directly linked to community engagement and are therefore substantiated, not speculative. The failure to disclose the complete assessment hampers proper scrutiny of these findings, thus limiting the ability to understand their significance in the decision-making process.

Additionally, there are indications that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these concerns have not been adequately incorporated into the main application nor given the attention they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning could be compromised. The failure to provide the complete dataset means the application lacks a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence at hand points to existing adverse effects that remain inadequately addressed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming within the application and a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the decision to withhold the full Social Impact Assessment, coupled with the evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs lawful determination and underscores the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on seascape, landscape, and visual aspects is significantly lacking, failing to adequately address both the extent of change anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines

situated near the shoreline threatens to create a continuous and overt industrial presence, which would fundamentally disrupt this character and lead to a permanent and irreversible alteration of the landscape.

Furthermore, the application does not sufficiently capture the degree of visual change expected. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and frequently visited coastal locations. This domination would directly affect visual amenity while compromising the essential qualities of naturalness and remoteness. The assessment fails to accurately convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and portrayal of visual viewpoints. Evidence indicates that these viewpoints might not adequately represent the most sensitive receptors or the most adverse scenarios, particularly in relation to vital cultural heritage sites and landscapes of high value. Such shortcomings suggest that the estimated magnitude of visual impact may have been downplayed, leading to questions regarding the reliability of the overall assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interdependence, resulting in a partial evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering the manner in which heritage assets are perceived and disrupting their association with the natural horizon. This impact transcends visual concerns, embodying a more extensive cultural and spatial detriment that has not been adequately evaluated within the application.

In terms of policy implications, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated scale of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a thorough worst-case scenario assessment further undermines any assertion of adherence to policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and inescapable. Consequently, the change brought about is fundamental and enduring, rather than something that could be diminished to an acceptable degree through mitigation efforts.

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

These deficiencies hinder a reliable evaluation and bolster the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures to address construction and pollution risks raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and the potential for accidental spills, it fails to provide adequate details regarding the prevention, control, or monitoring of these risks.

In addition, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies prevents a determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to marine species and habitats that have already been identified as sensitive within the broader assessment.

The assessment is further compromised by the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are in place to address potential pollution events. This deferral introduces procedural risks and undermines the competent authority's ability to assess the environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, thereby reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application does not adequately evaluate the impacts on fisheries and marine life, presenting significant risks to both the ecosystem and the local fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector, yet the proposal fails to establish how these vital resources can be preserved amidst development activities without causing major disruptions.

One critical concern is the assumption that fishing activities can be relocated without any negative effects. The application lacks supporting evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressures of displaced fishing efforts. This gap in information is crucial, as it raises the possibility of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and community livelihoods remain poorly understood due to this lack of a clear and evidence-based assessment.

Furthermore, the proposed development poses notable risks to marine species, especially due to the underwater noise generated during construction activities. High-energy hammer piling is anticipated to cause disturbances across extensive distances, which could adversely affect local species, including dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without adequate evidence to support such claims.

There is also a troubling inconsistency within the application regarding the necessity of licenses for actions that may harm European Protected Species. While the potential for such harm is acknowledged, impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises serious concerns about adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts that arise from multiple sources of pressure, such as habitat disruption, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what is a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore elements consist of cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive impact assessment for these onshore elements prevents a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore assessments means that the combined impacts on peatlands, habitats, and communities remain unclear.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This indicates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in adequately addressing this concern or in demonstrating that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been undertaken, prompting questions about deliverability and lawful implementation.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, 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.

TOURISM

The assessment of the tourism impacts is inadequate and does not evaluate the economic and social consequences for an important sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's

economy. However, the application fails to model the impact of industrialisation on the seascape and the loss of environmental quality on Tourism Gross Value Added or overall economic resilience. This lack of analysis means it is impossible to determine whether the development would provide a net economic benefit or harm a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, leaving a major gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and community sustainability. The failure to conduct a proper Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

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

Overall, the inability to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential criteria. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for determination is lacking in this application. There are notable deficiencies in baseline data, the use of an undefined design envelope, dependence on unspecified mitigation measures, and the exclusion of crucial impact pathways, including those related to nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Furthermore, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a substantial omission. These shortcomings obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4, as it fails to protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential repercussions for peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant risks to the environment. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and, in certain instances, inconsistent. The necessary evidential threshold 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.

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

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

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

Additional Comments

Time to stop the industrialisation of Scotland's land and seas.

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: 92D42FB3

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and related documents, which reveal 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 characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the wind farm, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful decision. Critical environmental data is notably absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The application's flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed view of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack robust support.

Furthermore, there are significant policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable under policy standards.

The unprecedented scale of the proposal, with large turbines placed near the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. The flexible Project Design Envelope employed, lacking concrete turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment and obscures the true environmental impacts, preventing both the public and the competent authority from fully understanding the proposal's consequences.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established prior to any determination.

The report also suffers from considerable evidential shortcomings, including gaps in baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a scientific uncertainty that is incompatible with statutory requirements.

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

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies inhibit a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot adequately evaluate the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in

favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

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

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

Significantly, the application does not adequately recognise or assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated. This inadequacy compromises any conclusions drawn about the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development is flawed, presenting significant gaps in evidence and inconsistencies that undermine its findings. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which hosts internationally important seabird populations that are already in decline. However, the application fails to sufficiently demonstrate that these species will not face adverse effects. There is a critical lack of evaluation regarding the implications of displacement, collision risk, or habitat loss related to the proposed development.

A notable contradiction is present in the application, where the developer asserts there will be no significant adverse effects while also making a case for Habitats Regulations derogation, which is typically only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that its conclusions do not align with the available evidence. Furthermore, the assessment does not adequately ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The reliance on modelling approaches introduces a level of uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe population declines. This may result in an underestimation of mortality rates due to incomplete baseline data and an insufficient

understanding of behavioural responses.

The proposed siting of turbines within a recognised migratory corridor adds another layer of significant risk, potentially acting as a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly investigate the long-term effects of sustained mortality within this corridor, nor does it consider the implications for species that have relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in the modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle, thereby obstructing a lawful conclusion that would support consent. Additionally, the identified deficiencies represent a breach of the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is seriously lacking. It overlooks the West Lewis coastline as a vibrant cultural landscape where community, language, tradition, and environment are interconnected. The application reduces heritage to mere static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised. These sites serve as active places for burial and spiritual practice, yet they are treated as unchanging features. This oversight fails to take into account their continued use and the effects of development on their environment. As a result, the evaluation of cultural impacts is incomplete, neglecting their vital role in community life.

Moreover, the assessment does not address intangible cultural heritage. Key elements like the Gaelic language, traditions, and the community's enduring relationship with the coastal landscape are crucial to the area's identity but are notably absent from the assessment. This omission hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking

population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of engagement calls into question the validity of the assessment and ignores established principles of participation in matters affecting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historical assets and locations. Not considering both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy standards.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposed development is significantly lacking in transparency and is inadequate for a lawful evaluation. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been published. This omission creates a substantial evidential gap that hinders both public understanding and the ability of the competent authority to grasp the full range of social risks uncovered by the developer's own research.

Summaries made available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and therefore are not mere speculation. However, the lack of disclosure regarding the full assessment limits proper scrutiny of the findings, ultimately restricting the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" identified in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor afforded the necessary consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for developments of this magnitude, particularly when they may disrupt community character and functioning. The application, in withholding the full dataset, fails to provide a comprehensive evidential foundation for balancing the proposed benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should contribute to positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain inadequately disclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation 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 that fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Overall, the decision to withhold the full Social Impact Assessment, coupled with evidence of current negative impacts, results in an incomplete and unreliable evaluation. This lack of information precludes a lawful determination and underscores the conclusion that the application is not backed by sufficient data.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment fails to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and pronounced sense of remoteness, would face a fundamental alteration due to the introduction of large-scale turbines near the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently represent the magnitude of the visual change, as the scale and proximity of the turbines would significantly dominate views from residential areas, historic sites, and popular coastal locations. Such changes would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of these impacts in relation to a sensitive landscape.

There are substantial methodological concerns regarding how visual viewpoints were selected and presented. It appears that the chosen viewpoints may not fully reflect the most sensitive receptors or represent worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, compromising the reliability of the assessment.

Additionally, the interconnected relationship between landscape, seascape, and cultural heritage has not been adequately considered. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context linked to the Atlantic horizon by visual and spatial relationships. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how heritage assets are perceived and disrupting their connection to the natural horizon. This represents not merely a visual impact but a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed changes are incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further undermines any assertion of policy compliance.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, rather than amendable 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 assertion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and the lack of detailed management plans. There is an incomplete assessment of construction and pollution risks, which does not provide the necessary detail to evaluate likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that will only be prepared post-consent, which inhibits any meaningful assessment of their adequacy or effectiveness.

This reliance on future measures raises significant concerns, particularly because of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are vulnerable to disturbances from sediment and potential contamination. While the application acknowledges risks such

as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these risks will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes that will arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it remains impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Further complicating these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application prevents any evaluation of whether appropriate safeguards are in place to respond to pollution events. This not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted. When such information is lacking, a lawful determination cannot be made. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of these shortcomings—lack of detailed management plans, the absence of defined mitigation measures, and uncertainty regarding potential impacts—renders the assessment inadequate. This prevents a thorough evaluation of construction and pollution risks and supports the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern arises from the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional pressure that displacement would entail. This gap is crucial, as it presents the risk of overfishing in other areas, with potential adverse economic ramifications for the local fishing fleet. In the absence of a detailed and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise resulting from construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to cause disturbances across extensive areas, which would impact species such as dolphins. Concerns regarding the predicted disturbance to a significant proportion of the local bottlenose dolphin population are serious, yet the application minimises the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously characterising such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is anticipated to necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application 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 current marine users or avoid significant negative impacts on marine biodiversity, thereby undermining the conclusion that this proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project is fundamentally flawed due to its incomplete assessment of onshore infrastructure. This project consists of both offshore turbines and onshore works, which are inherently connected. However, their assessment has been carried out separately, leading to a disjointed approach that fails to reveal the full extent of environmental and socio-economic impacts.

The onshore components involve significant work, including cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly in Barvas Moor, which is both an important carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which hinders the understanding of the project's overall environmental footprint.

By not fully addressing onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be evaluated together. The disaggregation of offshore and onshore elements leads to a lack of clarity about the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal poses risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been applied. This results in a significant gap in the evidence related to biodiversity protection.

Concerns about carbon balance are also prominent in this proposal. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy development. The application fails to properly address this matter or to show that the overall carbon balance is advantageous.

In addition, the planned routing of infrastructure through active croft land raises conflicts with current land use and legal rights. The application does not present evidence that necessary consents or procedures have been initiated, leading to doubts about the deliverability and lawful execution of the project.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to protect peatlands, habitats, and land use interests are inconsistent with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further compromises the application.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby obstructing 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 West Lewis coastline is renowned for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over considerable distances, would create a persistent and disruptive "wall of light" effect across the western horizon, drastically changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is especially troubling given the significance of dark skies to the area's identity and the

emerging sectors of tourism, such as astro-tourism. The omission represents a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data for the ornithological assessment exacerbates this issue, as it does not capture nocturnal activities or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential hazard remains unassessed. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

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

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

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

TOURISM

The evaluation of tourism impacts is critically inadequate, neglecting to assess the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen substantial growth, with income rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not address how the industrialisation of the seascape and the resultant loss of environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the proposed development would yield a net

economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in the understanding of impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to evaluate tourism impacts has broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately appraised as stipulated by the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminates in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its attempt to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This application revisits the critical issues that resulted in the refusal 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 emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to provide a reliable and comprehensive evidential basis for evaluation.

Key deficiencies in the application include significant gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

Additionally, the application suffers from procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the incomplete disclosure of the

Social Impact Assessment represents a material omission. Such deficiencies prevent the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal is incompatible with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and significant environmental risks persist, particularly concerning marine ecology, seabirds, protected species, and marine mammals. The assessments provided are incomplete and occasionally inconsistent, failing to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, which prohibits a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to obtain 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

I object to this entire development. It hugely impacts on the every day lives of islanders, especially doing development. Local infrastructure is not built to handle this work and will impact every day working life. Working back and forth across the island, I am not looking forward to dealing with the huge traffic disruptions. Really disappointed this has reached this stage and strongly object.

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: 9FF07E83

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears 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 protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a comprehensive, transparent, or reliable overview of the proposal's likely environmental effects. Central to this inadequacy is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty, hindering the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, restricting both the public's and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unarticulated at this stage. Seeking consent based on the premise that environmental harm will be mitigated subsequently obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. Such a deferral of vital information to post-consent phases is procedurally unacceptable, contradicting the essential purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These issues contribute to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated 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, particularly regarding biodiversity protection and environmental integrity, as it cannot confirm that impacts have been thoroughly assessed or that appropriate safeguards have been established.

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

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses 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 presents a narrative of project evolution. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

The absence of a transparent or evidence-based comparison of offshore locations, development scales, or design configurations is particularly concerning. Notably, the application does not show that the developer has genuinely considered the placement of turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such an analysis prevents any conclusion that the proposed siting is the least damaging option available.

These shortcomings are evident in the cable routing and landfall assessment as well, where there is insufficient evidence that alternative routes have been properly examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to establish a clear avoidance strategy, along with the lack of comparative analysis, suggests that mitigation by design has not been adequately employed, relying instead on measures to be implemented after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This neglect signifies a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain whether there exist less harmful and more appropriate alternatives. 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 areas, cultural heritage, and the wellbeing of communities. The absence of a structured and comparative assessment represents a material omission that significantly detracts from the overall conclusion that the application has not undergone adequate assessment and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A notable gap exists in the consideration of otters, which are a European Protected

Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to account for their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbance, noise, and increased activity, ultimately undermining any conclusions regarding significant effects on this species.

Additionally, the evaluation of basking sharks is deficient due to an overreliance on aerial surveys, which introduces a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The neglect to incorporate or appropriately consider such data leads to an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that adverse effects cannot be reasonably excluded, 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 deficiencies inhibit a comprehensive evaluation of impacts on marine ecology and protected species, further affirming that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application has significant flaws that raise serious concerns. It is clear that the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline. However, the application fails to provide sufficient evidence that these species will not be adversely affected. The proposed development is situated within crucial foraging areas and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

A major inconsistency within the application arises when the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is typically only necessary if significant harm is

anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying evidence. Furthermore, the assessment lacks adequate evidence to demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling approaches introduces uncertainty, especially regarding species in severe decline, including Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses a further significant risk, as it effectively creates a barrier in a primary flight path that species use to travel between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of continued mortality in this corridor or the potential impact on species with relatively small global populations.

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

The identified deficiencies also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places this proposal directly at odds 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 impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application proposes a development that fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are intrinsically connected. The evaluation adopts a reductive view of heritage, treating it as isolated and static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency in the assessment is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are categorised as static features, overlooking their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their essential role in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the assessment, representing a considerable omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the validity of the assessment and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure in the application is the absence of a compliant Island Communities Impact Assessment, which is 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 precludes a lawful determination.

From a policy perspective, these deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to assess 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 properly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological issues have also been identified regarding the selection and

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal has significant deficiencies regarding the assessment of construction and pollution risks, which ultimately hampers the evaluation of potential environmental effects. The absence of detailed Construction Environmental Management Plans and Pollution Prevention Plans is alarming, particularly given the high-energy Atlantic environment in which substantial seabed preparation and installation works are to occur. Instead of providing a thorough analysis, the application defers key mitigation and contingency measures to a post-consent stage, which prevents any meaningful evaluation of their sufficiency or effectiveness.

The concerns are amplified by the sensitivity of the receiving environment along the West Lewis coastline, which hosts clean coastal waters and vital habitats that are

susceptible to sediment disturbance and contamination. Although the application recognises potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to adequately outline how these threats will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the extent and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects or the duration and extent of these impacts. This uncertainty extends to marine species and habitats identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing the development of contingency planning until after consent is granted, the application undermines the ability to assess whether sufficient safeguards are in place for pollution events. This introduces significant procedural risks and limits the competent authority's ability to evaluate environmental protection measures at the time of decision-making.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime, which mandates that significant effects and necessary mitigations be assessed prior to consent. The absence of critical information means that a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with existing policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty regarding potential impacts collectively render the environmental assessment inadequate. These shortcomings obstruct a thorough examination of construction and pollution risks and support the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a vital fishing industry. However, the proposal does not adequately demonstrate that these crucial uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activities can be shifted without repercussions. The application lacks evidence showing that alternative fishing grounds are not only available but also accessible and capable of handling increased pressure. This significant omission raises alarm, as displacing fishing activities threatens to lead to overfishing in other areas, potentially resulting in detrimental economic impacts on the local fleet. Without a detailed and evidence-based analysis,

the consequences for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

There is a significant inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment does not address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and fishing activity displacement. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal qualifies as sustainable development.

In conclusion, the absence of solid evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to capture the full extent of impacts stemming from an integrated project. The connection between offshore turbines and onshore works has not been adequately acknowledged, leading to a fragmented evaluation that obscures the true environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which is both an ecologically sensitive habitat and a significant carbon store. The lack of a comprehensive assessment of these impacts prevents an accurate understanding of the project's overall environmental footprint.

By omitting a thorough evaluation of onshore impacts or deferring them, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively, yet the disjointed approach towards offshore and onshore elements means the combined repercussions on peatlands, habitats, and surrounding communities remain inadequately understood.

There are also serious threats to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application has not substantiated that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding the protection of biodiversity.

Moreover, the disturbance of peatland raises critical concerns about carbon balance, as it releases stored carbon, potentially leading to a carbon debt that contradicts renewable energy objectives. The application does not sufficiently address this issue or prove that the overall carbon balance is still favourable.

Routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application lacks evidence that essential consents or processes have been commenced, which raises concerns about deliverability and lawful execution.

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

Overall, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to evaluate the effects on nocturnal wildlife, including sensitive species such as Manx

Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

This gap is made worse by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, known to forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

Without evaluating these nocturnal impacts, it is impossible to determine if protected species or designated sites would face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, triggering the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The proposal fails to adequately assess the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism, which has seen a substantial increase from £65 million in 2017 to over £81.5 million, supports more than 1,000 jobs and constitutes up to 16% of the island's economy. The application acknowledges that 86% of visitors are attracted to the scenery yet does not provide a quantified evaluation of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or economic contributions.

Furthermore, there is a notable deficiency in understanding the significance of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies. These elements are crucial for enhancing visitor experiences and have relevance for emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment deepens this gap, leaving key impacts on a recognised and growing segment of the local economy unexamined.

The implications of failing to assess tourism impacts extend beyond the economic sphere, affecting employment opportunities, local businesses, and community sustainability in an island community with limited economic diversification. The lack of a compliant Island Communities Impact Assessment means that these vulnerabilities

have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impacts and the necessity to illustrate net benefit. Additionally, it contradicts strategic goals that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the combination of unquantified tourism impacts, inadequate assessment of environmental influences on visitor behaviour, and a disregard for the island's economic dependencies creates a significant evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The 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.

Additional Comments

I am ten years old and I live really close to the beach. I love watching the waves crash on the cliffs. I am really worried about the wind turbines. I know climate change isn't good but what about all the whales and dolphins and birds that will be hurt? I also read that the turbines are bad for your health because they are so huge. That is pretty scary. I hope there is a better way that we can help to make a difference in the world without ruining what we still have.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6EC4BE92

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A comprehensive review of the Environmental Impact Assessment Report and accompanying documents highlights numerous material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west side of the Isle of Lewis, this development threatens an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The nature, size, and design of the proposal raise serious questions about its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a solid evidential foundation necessary for lawful determination. It reveals significant gaps in critical environmental data, presents limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of the likely significant effects. Furthermore, the proposed mitigation measures, which have yet to be clearly articulated, hinder any assessment of their potential effectiveness. Consequently, the documentation fails to provide a thorough or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Substantial conflicts with established policy are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national mandates for protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies challenge the statutory tests necessary for consent and undermine the competent authority's ability to determine the proposal's acceptability in policy terms.

The scale of the proposed development is unprecedented for this locale, with large turbines located disturbingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, the reliance on unspecified mitigation strategies, evidential shortcomings, and evident policy violations illustrate that the application is fundamentally incomplete and incapable of facilitating a lawful decision. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposal under consideration demonstrates a significant shortfall in the assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of viable alternatives based on their environmental impacts, the

application merely outlines a narrative of the project's development. This approach does not adequately prove that less harmful options have been thoroughly identified, assessed, and preferred over more damaging alternatives.

There is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has properly considered the option of placing turbines further offshore, a move that could likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the critical role of proximity to shore in determining impacts mean that the omission of this analysis prevents any justification for concluding that the proposed siting is the least damaging available option.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is insufficient evidence of exploration into alternative routes that could avoid or minimise impacts on sensitive receptors. This includes consideration of areas with cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest a failure to apply mitigation by design, relying instead on mitigation measures that occur post-design.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy, hindering the competent authority's ability to determine whether there are less harmful and more suitable alternatives. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal is sustainable or complies with relevant policy.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission that leads to the overarching conclusion that the application has not undergone proper assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding its impact on marine ecology and protected species. The assessment conducted does not provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment, which is a highly sensitive and biologically active marine system. Incomplete baseline data and inadequate methodologies have failed to capture vital information regarding species presence, behaviour, and habitat use. Consequently, this assessment lacks a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, a European Protected Species. The

application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed. Such deficiencies undermine any conclusions regarding the absence of significant effects on the species.

Similarly, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce significant detection bias in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data leads to an incomplete baseline and further weakens the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The absence of sufficient baseline data also obstructs meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious questions about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In such circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability and adherence to regulatory standards. It indicates that the west coast of the Isle of Lewis, home to internationally important seabird populations, is not adequately protected. Many of these species are already in decline, yet the application fails to provide sufficient evidence that their interests will not be adversely impacted. The turbines are sited within vital foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss remain poorly evaluated.

A critical inconsistency undermines the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated, calling the credibility of the assessment into question. Furthermore, the application does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis

Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling approaches adds uncertainty, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses an additional risk by effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly consider the long-term consequences of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, preventing a lawful conclusion in favour of consent.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is fundamentally flawed due to internal inconsistencies, methodological shortcomings, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is not adequate. It does not recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are connected. The application takes a simplistic approach, viewing heritage as isolated, static assets instead of understanding their ongoing social, cultural, and spiritual roles in the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These places serve as active sites for burial and spiritual practices, yet the assessment classifies them as unchanging features, overlooking their current use and significance, as well as the development's effect on their setting. This misunderstanding leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

The application also neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but are

entirely missing from the assessment, which is a major oversight. Without considering these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement weakens the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure in the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone prevents a lawful decision.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, deviates from policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the complete Social Impact Assessment significantly hinders a thorough evaluation of social impacts, health, and wellbeing, resulting in a lack of transparency that is essential for a lawful review. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a notable evidential gap, limiting both public awareness and the competent authority's understanding of the social risks uncovered by the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the comprehensive assessment, proper scrutiny of the findings is impossible, thereby constraining the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with concerns regarding "cultural loss" highlighted in the developer's findings. Despite this recognition, these social impacts have not been adequately addressed in the main application or afforded the appropriate consideration. The

failure to disclose the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. To fully grasp the social, economic, and health implications of developments of this magnitude, particularly regarding community character and functioning, a complete dataset is vital. The current application does not provide a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development proposals must promote positive health outcomes and avoid adverse impacts. However, the evidence available points to existing detrimental effects that have not been transparently communicated. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application, failing to satisfy the evidential standards set by the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and 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 assessment of the seascape, landscape, and visual impacts related to the proposed development is significantly lacking and does not adequately represent 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 profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would result in a continuous and imposing industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Additionally, the application fails to accurately depict the magnitude of the visual changes anticipated. The scale and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would directly impact visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts within the context of such a sensitive landscape.

There are also serious methodological issues with the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural

heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the reliability of the assessment.

Moreover, there is a notable deficiency in the assessment's consideration of the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, which is visually and spatially connected to the Atlantic horizon. The assessment treats these assets in isolation, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

Finally, it is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbances. The application currently lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, which are essential for evaluating the likely environmental effects associated with the substantial seabed preparation and installation works in this high-energy Atlantic environment. Instead, the proposal relies on mitigation and contingency measures to be prepared after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

There exists 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. Furthermore, while the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide adequate details on prevention, control, or monitoring measures. This lack of information is particularly concerning given the sensitivity of the receiving environment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application fails to allow for the evaluation of whether suitable safeguards are established to address potential pollution events. Such a deferral introduces procedural risk and hinders the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the omission of critical environmental safeguards contravenes the requirements set forth by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to consent; failure to provide this information means a lawful determination cannot occur. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts results in a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks, supporting the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed application for development fails to provide a comprehensive assessment of fisheries and marine life, which is critical for understanding ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry; however, the submission does not adequately demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A fundamental concern arises from the assumption that fishing activities can be relocated without negative consequences. The application does not furnish any evidence that alternative fishing grounds exist, are accessible, or can accommodate increased pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas, with potentially serious economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based analysis means that the repercussions for fisheries and livelihoods remain unclear.

Additionally, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over a prolonged period is likely to disturb species over considerable distances, with particular concern for dolphins. The predicted disruption to a significant

segment of the local bottlenose dolphin population raises alarming issues, yet the application tends to minimise the importance of these effects, lacking adequate supporting evidence.

The application exhibits a notable inconsistency; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious compliance issues with the Habitats Regulations, especially when harm is foreseen to a degree that necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential, as it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions without it.

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

In conclusion, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the presence of internal inconsistencies lead to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore works associated with this project include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities will require excavation in areas of deep peat, especially within Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The failure to provide a thorough assessment of these impacts prevents a clear understanding of the overall environmental footprint of the project.

The assessment of onshore infrastructure is materially incomplete and does not consider the full extent of impacts from what is a single integrated project. The offshore turbines and onshore components are interconnected; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects, as excluding or deferring the assessment of onshore impacts hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed together, yet the separation of onshore and offshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

There are serious risks to sensitive habitats, including machair systems and peatland environments that are protected under policy. The application does not convincingly demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a significant evidential gap concerning biodiversity protection.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide evidence that the necessary consents or processes have been initiated, which casts doubt on the project's deliverability and lawful implementation.

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

In summary, the separation of project components, the absence of comprehensive assessments, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, ultimately obstructing a lawful determination. The proposal also raises concerns about carbon balance, as disturbance of peatland results in the release of stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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.

TOURISM

The proposal does not adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution to the area.

Tourism has seen significant growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the potential effects of the industrialisation of the seascape and the resulting loss of environmental quality on Tourism Gross Value Added and the broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would provide a net economic benefit or detract from an established and expanding sector.

Additionally, the assessment does not take into account the crucial role of environmental quality in tourism. The significance of unspoiled landscapes and dark skies is essential for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortfall, resulting in a notable absence of understanding regarding the impacts on a

recognised and growing aspect of the local economy.

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

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

Overall, the lack of quantification regarding tourism impacts, the absence of an assessment of the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies create a significant gap in evidence. This undermines a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A complete and reliable evidential basis for determining this application is lacking. There are significant gaps in baseline data, and the use of an undefined design envelope raises concerns. Additionally, the application relies on unspecified mitigation measures and fails to address critical impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects and 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. Furthermore, the failure to disclose the full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct opposition to National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It

has not demonstrated that health and wellbeing impacts are acceptable, nor can it prove a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

This proposal would also lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism represent permanent changes that cannot be adequately 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, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise relevant regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

I may no longer live on the west coast of the island however I was raised there. I continue to Croft there every day of my life.

I fear for the effect this project will have on the community surrounding it. Many of whom crofters who already live a solitary life and one of the few things that these people find solace in is the quiet, clean and natural atmosphere in which they exist. Free from blemish or industrial intervention.

I fear for the effect it will have on my livestock, the local animals with which they co-exist and even the insects that our ecosystem relies upon. Most of these animals and insects in desperate need of regenerating a failing population.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3E781477

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, as these factors fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures hinders the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident within the proposal. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate adherence to national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to affirm the development's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance underscores the application's incompleteness and its incapacity to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates significant uncertainty. This compromises the assessment's integrity and obscures the true environmental impacts, making it difficult for both the public and the competent authority to grasp the full extent of the effects.

The application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consequently, consent is sought on the premise that environmental harm will be resolved later, which impedes a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is not procedurally acceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly outlined before a decision is made.

Furthermore, there are considerable evidential deficiencies, including gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty about the scale and significance of impacts, especially where claims of negligible effects are made without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly its stipulations on biodiversity protection and environmental integrity, since it is unclear whether the impacts have been thoroughly assessed or if appropriate safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on environmental effects. This approach is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime. Consequently, it fails to demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a significant lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact highlight that the absence of such an analysis obstructs any conclusion about whether the proposed siting is the least damaging option available.

Deficiencies are evident in the assessment of cable routing and landfall, as well, where insufficient evidence indicates that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes 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, resulting in an overreliance on post-design mitigation measures.

As a result of these shortcomings, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy inhibits the competent authority's ability to ascertain whether there are less harmful and more appropriate alternatives. Without a comprehensive assessment of alternatives, the proposal cannot be deemed a sustainable or policy-compliant solution.

From a policy perspective, these inadequacies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that significantly contributes to the conclusion that the application has not been adequately assessed, preventing lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species within the West Lewis coastal environment presents significant deficiencies. This area is known for its sensitivity and biological activity, yet the available baseline data is incomplete. The methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species, resulting in a lack of sound evidential basis for assessing impacts.

A critical shortcoming is evident in the assessment of otters, which are classified as a European Protected Species. The application inadequately recognises and evaluates their active utilisation of coastal regions for foraging and movement. This oversight means that the assessment does not account for their core foraging range and behavioural patterns, leaving the potential effects of construction disturbance, noise, and increased activity unassessed. Consequently, any conclusions drawn about the lack of significant effects on this species are fundamentally undermined.

Further shortcomings are found in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological weaknesses imply that the conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. Moreover, the absence of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leaves uncertainty about the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application fails to satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The uncertainty created through these omissions means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These significant deficiencies preclude a robust evaluation of impacts on marine ecology and protected species, thereby indicating that the application lacks a solid evidential foundation.

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

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

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the community's long-standing bond with the coastal environment. These aspects are essential to the area's identity but are

entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

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

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

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

Overall, the neglect to evaluate living heritage, intangible cultural significance, community rights, and necessary statutory assessments results in a major evidential deficiency. The cultural effects of the development remain unexamined, and the application fails to provide an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are potentially at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the harms.

Moreover, the assessment of social impacts, health, and wellbeing is critically deficient and lacks the necessary transparency for a lawful evaluation. Although the developer engaged local residents through a Social Impact Assessment, the complete report has not been made available. This creates a substantial evidential gap, obstructing both public insight and the competent authority's ability to comprehend the full scope of social risks identified by the developer's own research.

Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, and therefore are not speculative in nature. However, the

failure to disclose the entire assessment hampers proper scrutiny of these findings and restricts the capacity to ascertain their significance in the decision-making process.

There is also a clear indication that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or afforded the appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development should promote positive health outcomes and avoid causing harm, yet the existing evidence points to adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission is a material flaw within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts leads to an incomplete and unreliable assessment. This reality obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline has an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposal for large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The application fails to represent 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 impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact on such a sensitive landscape.

Methodological issues are present in the selection and representation of visual viewpoints. Evidence suggests that the chosen viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the true magnitude of visual impact may have been understated, which calls into question the reliability of the assessment.

There is also a failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This results in not just a visual impact, but a more extensive cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further weakens any claims of compliance with policy requirements.

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

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks lacks necessary detail for a proper evaluation of likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it depends on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures raises significant concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application does not allow for an evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

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

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

FISHERIES AND MARINE LIFE

The proposed development poses serious risks to marine life and the fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector. However, the application does not adequately demonstrate how these habitats and uses will be protected from significant disruption.

A major concern is the assumption that fishing activities can be shifted without negative consequences. The application lacks evidence to show that alternative fishing grounds exist, are accessible, or can handle the additional pressures of displaced fishing. This gap in information is critical, as forcing displacement could lead to overfishing in other areas and have detrimental economic impacts on the local fishing fleet. Without a solid, evidence-based evaluation, the repercussions for fisheries and livelihoods remain unclear.

Moreover, the project poses considerable threats to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is anticipated to disturb marine life across extensive areas, particularly affecting dolphins. The expected disruption to a significant portion of the local bottlenose dolphin population raises substantial worries, yet the application minimises these effects without adequate evidence.

There is also a notable inconsistency within the application that acknowledges the necessity for licences to allow harm to European Protected Species while concurrently claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and brings up concerns about adherence to the Habitats Regulations, especially where anticipated harm may require legal authorisation.

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

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

Overall, the absence of evidence regarding fishing displacement, underestimation of noise impacts, and internal contradictions make the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with the project is fundamentally flawed, failing to address the comprehensive impacts stemming from what constitutes a single integrated development. The offshore turbines and the onshore works are interconnected, yet they are evaluated in isolation, leading to a fragmented assessment that obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the cabling that traverses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through ecologically sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically sensitive habitat. The application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The application also neglects to assess onshore impacts adequately, which prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates a holistic consideration of all project components; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection, are also present. The application

fails to demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a notable evidential gap regarding biodiversity protection.

Moreover, concerns arise regarding carbon balance due to the disturbance of peatland, which can release stored carbon and potentially create a carbon debt, undermining the objectives of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or procedures have been initiated, leading to questions about the project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant deficiency within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute critically to environmental quality, cultural identity, and the value of tourism. The proposed installation of permanent red aviation lighting, which is visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, which is a notable oversight considering the essential role of dark skies in the area's identity and the emerging sectors of astro-tourism. This lack of consideration leads to a significant gap in the landscape and environmental assessment.

Moreover, there is no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application does not include any evaluation of lighting impacts or a phototaxis study, thereby neglecting to address how the aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which fails to account for nocturnal activity or associated risks. Other species, like Kittiwakes, which may forage or migrate during the night, are equally vulnerable to disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

In the absence of a nocturnal impact assessment, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and hinders a lawful determination.

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

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

TOURISM

The application fails to address the significant impacts on tourism, a sector that has become increasingly vital to the Isle of Lewis economy, growing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. Tourism accounts for up to 16% of the island's economy, yet the assessment does not provide a quantified analysis of how the proposed large-scale offshore infrastructure may affect visitor numbers, behaviour, or the overall economic contribution of this sector. While the application notes that 86% of visitors are attracted by the area's scenery, it neglects to model the potential consequences of industrialising the seascape and compromising environmental quality on Tourism Gross Value Added and the broader economic resilience of the community.

Moreover, the assessment disregards the critical role that environmental quality plays in sustaining tourism. Unspoiled landscapes and dark skies are essential to enhancing visitor experience, and the emergence of niche markets like nature-based tourism and astro-tourism highlights this significance. The absence of a Dark Skies Assessment further exacerbates the shortcomings of the evaluation, creating a major gap in understanding the impacts on this increasingly important aspect of the local economy.

For an island community with limited economic diversification, neglecting to assess tourism impacts raises considerable concerns regarding employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have

not been properly evaluated as stipulated by the Islands (Scotland) Act 2018.

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

Ultimately, the lack of quantifiable tourism impacts, the oversight of environmental factors that influence visitor behaviour, and the failure to acknowledge the island's economic dependency culminate in a significant evidential gap. This hinders a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D30458D0

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, failing to provide a comprehensive view of the environmental effects related to the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces a considerable degree of uncertainty, undermining the integrity of the assessment and obscuring the true environmental impacts from both the public and the relevant authority. As a result, the actual consequences of the development may not align with what has been presented, preventing a clear understanding of its environmental ramifications.

Moreover, the application depends significantly on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent based on the promise of addressing environmental harm later is procedurally inappropriate. This approach undermines the core purpose of the Environmental Impact Assessment regime, which mandates that potential significant effects and necessary mitigation should be thoroughly established prior to any determination.

The report is further compromised by substantial evidential deficiencies, including a lack of baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These gaps lead to uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficiency of information impedes a thorough understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation necessitates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly evaluated or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental effects, it merely outlines the project's development history. This lack of analysis does not show that less harmful options have been properly identified and

assessed in preference to more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The sensitivity of the West Lewis coastline makes proximity to shore crucial in assessing impact. The lack of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy also applies to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with the lack of comparative analysis, suggests that design-based mitigation has not been implemented, leading instead to reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely deficient assessment of marine ecology and protected species, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, classified as a European Protected Species. The application inadequately addresses their active foraging and movement within coastal areas. This neglect of their core foraging range and behavioural patterns raises concerns about the potential effects of construction disturbance, noise, and increased activity, which have not been sufficiently evaluated. Such oversights undermine any assertions regarding the lack of significant effects on this species.

The evaluation of basking sharks also reveals significant deficiencies, particularly due to an over-reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodology likely underestimates the sharks' presence, especially when compared to established land-based observations that indicate these waters are frequently used by them. The failure to properly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risks posed to marine species and habitats.

Regulatory scrutiny reveals that the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify or assess protected species introduces a level of uncertainty that precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In such circumstances, the law does not permit consent to be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application for the development is fundamentally flawed and cannot be relied upon. It presents significant gaps in evidence and contains internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, which are already in decline. However, the application fails to sufficiently demonstrate that these species will not be adversely affected. This development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been adequately evaluated.

The application contains a notable contradiction; while the developer concludes that there are no significant adverse effects, they also put forward a Habitats Regulations derogation case. This is only necessary when significant harm is expected, which raises serious questions about the reliability of the assessment. Furthermore, there is inadequate evidence to support the claim that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces further uncertainty, particularly for species facing severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality,

especially considering that baseline data is incomplete and behavioural responses remain inadequately understood.

The location of turbines within a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or consider the potential effects on species that have relatively small global populations.

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

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community interweave. The application adopts a narrow perspective, viewing heritage as a collection of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their continued use and meaning, as well as the impact that development could have on their setting. This inadequate representation leads to an incomplete understanding of cultural effects and disregards their role in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely omitted from the assessment, which represents a significant lapse. Without the consideration of these factors, one cannot adequately

grasp the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement questions the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone hinders lawful determination.

From a policy standpoint, these inadequacies place the proposal in clear conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a significant departure from policy requirements.

In summary, the failure to consider living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing raises serious concerns about the evaluation's validity. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the complete report has not been made available, creating a significant gap in evidence. This absence of information obstructs both public understanding and the competent authority's ability to assess the social risks identified by the developer's own research.

Existing summaries reveal that residents are facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal. These findings stem from direct community engagement rather than speculation. Nevertheless, the failure to disclose the entire assessment hampers scrutiny of the results and limits the capacity to ascertain their relevance within the decision-making process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the

actual social and human costs associated with the development.

This transparency issue undermines the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for projects of this magnitude, particularly when community character and functioning may be influenced. The application's failure to provide the full dataset means it lacks a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet current evidence suggests existing negative effects have not been fully revealed. Without the complete assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, makes the assessment incomplete and unreliable. This situation hinders lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application's evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to accurately reflect the sensitivity of the receiving environment and the scale of change. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a pronounced sense of remoteness. The introduction of large-scale turbines near the shoreline would create a pervasive industrial presence, fundamentally altering the character of this landscape and leading to a permanent and irreversible transformation.

Moreover, the application does not sufficiently portray the extent of this visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the assessment's reliability.

Additionally, there is a significant shortcoming in evaluating the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete appraisal of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The extent of change proposed is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within the Atlantic's high-energy environment. However, the assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be formulated after consent is granted. This approach hinders any substantial assessment of their potential effectiveness or adequacy.

The reliance on unspecified future measures raises serious concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, both of which are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not

sufficiently outline how these risks will be prevented, controlled, or monitored.

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

The lack of comprehensive emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces procedural risks and diminishes the capacity of the competent authority to adequately assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent; the absence of such information means that a lawful determination cannot be made. Additionally, the application does not illustrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which appears insufficient and lacks a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to adequately demonstrate how these habitats and uses can be protected or maintained without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without repercussions. There is no evidence provided that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This notable omission is consequential, as such displacement threatens to exacerbate overfishing in other areas and could lead to broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal presents considerable risks to marine species, notably through

underwater noise produced during construction activities. The use of high-energy hammer piling over extended periods is likely to create disturbances that affect marine life over large distances, with particular concern for species like dolphins. The projected disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application appears to downplay the importance of these effects, lacking adequate supporting evidence.

The application exhibits a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which undermines any conclusion regarding the sustainability of the proposal.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning onshore infrastructure remains significantly inadequate, failing to account for the full range of impacts associated with what constitutes a single integrated project. The connection between offshore turbines and onshore activities is critical; however, their separate evaluations result in a fragmented methodology that obscures the overall environmental and socio-economic consequences.

Onshore components encompass cabling traversing protected moorland, the construction of a substation close to Stornoway, and related access infrastructure through sensitive landscapes. These undertakings involve excavation in regions of deep peat, notably within Barvas Moor, recognised as both a crucial carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's total environmental footprint.

Moreover, the omission or deferral of onshore impact assessments obstructs the

proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project must be evaluated collectively. Nonetheless, the delineation between offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application fails to illustrate that the potential impacts on these habitats have been fully examined or that suitable avoidance measures have been put in place, creating a significant evidential void concerning biodiversity protection.

The proposal also prompts concerns relating to carbon balance. The disruption of peatland leads to the release of stored carbon, which could result in a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or prove that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or processes have been initiated, leading to uncertainties regarding the project's deliverability and lawful execution.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The incapacity to show that impacts can be avoided or mitigated further compromises the application's integrity.

When considered collectively, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment notably fails to address the crucial elements of dark skies and nocturnal wildlife. The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to 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 an intrusive “wall of light” effect along the western horizon, thereby fundamentally changing the night-time environment.

The application neglects to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant considering the importance of dark skies to local identity and to

emerging sectors like astro-tourism. Consequently, there is a clear gap in the overall landscape and environmental assessment.

More alarmingly, the proposal does not assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means that potential effects of aviation lighting on these species and the associated risk of increased mortality have not been considered.

This shortcoming is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has gone unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy viewpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural environments and quality. Moreover, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the ecological setting.

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

TOURISM

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

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

anticipated industrialisation of the seascape and the potential degradation of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this critical analysis, it remains unclear whether the development would yield a net economic benefit or pose a threat to a sector that is both established and expanding.

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

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity of demonstrating net benefit. It contradicts strategic objectives that highlight tourism as a key growth sector, while also lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

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

SUMMARY

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

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

provide a clear understanding of likely significant effects or residual impacts.

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

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

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

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

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

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

Additional Comments

Coming from a family who has lived and worked in this area for generations and being the mother of four young people aged 18, 20, 22 and 24 all still living in Bragar, I am disgusted by how our communities are being ignored. My husband can also trace his Westside heritage back many generations. This development may be the very thing that breaks this continuity.

The jobs that will come will not be for locals. Neither will the benefits. The student

recipients of the bursaries have not been people who will be directly impacted and as such this money is a marketing ploy. My 18 and 20 year old daughters, one having just completed her third year at University and the other set to embark on her university career in September, would rather face student debt and working long hours while studying, than accept such a bribe. If we as a family can resist the lure of this money, when we don't have much to spare, why can't our politicians?

The negative impact on our wellbeing - aurally, visually, economically and culturally - will be immeasurable. The destruction of the seabed and other ecological impacts cannot be reduced to collateral damage. This is not an environmentally friendly project. It is financially and commercially motivated and our island and our communities are being sold off for short term gain. I am seriously concerned about the backhanders that may be going on. It feels like we are being threatened into silence as so many of us work for the council and are expected to keep our mouths shut.

I object vociferously to this development. It is an affront to islanders and akin to a modern day land (sea) grab; putting profit ahead of people. I have cried over this. My family and neighbours have cried over this. And we want to be heard.

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: 67CD5606

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 based on an examination of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies related to planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns arise from the scale, design, and proximity of the proposal, which raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Moreover, key elements of the proposal remain undefined, leading to ambiguity in understanding potential significant effects. The use of a flexible design framework complicates the ability to assess these effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There exist substantial conflicts with established policies. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for obtaining consent and compromise the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant issues concerning landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and does not support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of 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 and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively assessed or that suitable safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and insufficient. These shortcomings obstruct a lawful and thorough assessment of environmental effects, thereby placing the competent authority in a position where it cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

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

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

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

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

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

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 assessment of the proposed development exhibits significant deficiencies, undermining its reliability and the conclusions drawn from it. A crucial aspect of the application is the presence of contradictory findings, particularly where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This latter case is only warranted in situations where substantial harm is anticipated, which casts doubt on the reliability of the assessment and suggests a disconnect between the conclusions and the available evidence.

The assessment fails to adequately demonstrate that seabird populations associated with critical protected sites, such as the Lewis Peatlands and St Kilda, will not face adverse impacts. There is insufficient consideration given to the significance of key feeding grounds, and the reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies utilised may also lead to an underestimation of mortality rates, especially given the gaps in baseline data and the incomplete understanding of species' behavioural responses.

Furthermore, the placement of turbines within a recognised migratory corridor adds another layer of risk, as it effectively acts as a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term consequences of sustained mortality in this corridor, nor does it adequately address the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means that the standard of proving beyond reasonable scientific doubt has not been fulfilled. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

In addition, the identified deficiencies indicate a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to conclusively demonstrate that internationally important seabird populations will not be adversely affected results in a direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal's assessment of cultural heritage and community identity is fundamentally flawed. It fails to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active places of burial and spiritual practice. The assessment

overlooks their continued use and meaning, failing to appreciate how the proposed development would affect their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and neglects their importance to community life.

Moreover, the application does not adequately consider intangible cultural heritage, including the Gaelic language and local traditions, nor does it reflect the enduring relationship between the community and the coastal environment. These factors are essential to the area's identity, yet they are entirely excluded from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains obscured.

There are also significant issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been consulted through a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the assessment's validity and does not align with recognised principles of participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a severe procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is critical and prevents a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear divergence from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a solid foundation for determining the actual cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impact assessment associated with the development is significantly lacking in transparency, making it impossible to conduct a lawful evaluation. Although the developer conducted a Social Impact Assessment and engaged with local residents through focus groups, the full report has not been made available. This creates a major evidential gap, which hampers both public understanding and the competent authority's ability to gauge the social risks outlined by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, based on direct engagement rather than speculation.

However, the absence of the complete assessment restricts the ability to scrutinise these findings fully and diminishes their significance in the decision-making process.

Moreover, there are indications that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the necessary consideration. The lack of transparency regarding the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This deficiency compromises the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application cannot provide a thorough evidential basis for assessing the trade-offs between benefits and detriments.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available points to current adverse effects that have not been fully disclosed. Therefore, without the complete assessment, it is impossible to demonstrate compliance with this policy.

The implications of this situation are considerable. The competent authority cannot perform a comprehensive socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential standards set by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on seascape, landscape, and visual aspects is significantly lacking, failing to adequately address both the extent of change anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated near the shoreline threatens to create a continuous and overt industrial presence, which would fundamentally disrupt this character and lead to a permanent and irreversible alteration of the landscape.

Furthermore, the application does not sufficiently capture the degree of visual change expected. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and frequently visited coastal locations. This

domination would directly affect visual amenity while compromising the essential qualities of naturalness and remoteness. The assessment fails to accurately convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and portrayal of visual viewpoints. Evidence indicates that these viewpoints might not adequately represent the most sensitive receptors or the most adverse scenarios, particularly in relation to vital cultural heritage sites and landscapes of high value. Such shortcomings suggest that the estimated magnitude of visual impact may have been downplayed, leading to questions regarding the reliability of the overall assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interdependence, resulting in a partial evaluation of their setting and cultural importance.

The proposed industrialisation of the seascape threatens to sever these relationships, altering the manner in which heritage assets are perceived and disrupting their association with the natural horizon. This impact transcends visual concerns, embodying a more extensive cultural and spatial detriment that has not been adequately evaluated within the application.

In terms of policy implications, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The anticipated scale of change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a thorough worst-case scenario assessment further undermines any assertion of adherence to policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and inescapable. Consequently, the change brought about is fundamental and enduring, rather than something that could be diminished to an acceptable degree through mitigation efforts.

In summary, the assessment does not accurately depict the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and bolster the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed application lacks the necessary details to effectively assess construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are

no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be established post-consent, which inhibits any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures is particularly alarming given the sensitivity of the West Lewis coastline, which 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 accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on sensitive marine species and habitats identified in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and obstructs the assessment of environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively indicate that the assessment is seriously lacking. These deficiencies hinder a robust evaluation of construction and pollution risks, further substantiating the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application related to this development lacks a thorough assessment of its ecological and socio-economic impacts. A critical flaw is the presumption that fishing activities can be relocated without repercussions. There is no evidence presented that alternative fishing grounds are available, easily accessible, or capable of withstanding additional fishing pressure. This significant gap raises

concerns over potential overfishing in other areas, which could adversely affect the local fishing fleet's economic stability. The absence of a clear, evidence-based evaluation makes it impossible to fully understand the implications for fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling for prolonged periods is expected to disturb marine life across extensive areas, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Additionally, there is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, particularly when anticipating harm that necessitates legal authorisation. The assessment further fails to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these compounded effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the requirements of the National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development. Collectively, the inadequacies surrounding evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment highlight its incompleteness and unreliability, obstructing a thorough evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately address the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the associated onshore works are interrelated; however, they are evaluated separately, leading to a fragmented analysis that fails to reflect the true scale of 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 infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically delicate habitat. The current application lacks a thorough assessment of these impacts, which prevents a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been put in place, resulting in a notable evidential gap concerning biodiversity protection.

Concerns also arise regarding the project's carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt that contradicts the principles of renewable energy development. The application fails to sufficiently address this concern or to demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that necessary consents or processes have been initiated, thereby raising questions about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and 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 a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive “wall of light” across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting impacts visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the role of dark skies in the area's identity and the potential growth of sectors such as astro-tourism. This failure to assess such impacts

results in a clear deficiency in the overall landscape and environmental evaluation.

Moreover, there is a lack of consideration for the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting, which can lead to disorientation and a heightened risk of collisions. The absence of any lighting impact assessment or a study on phototaxis means there is no evaluation of how aviation lighting might affect these species or increase mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

Assessing nocturnal impacts is essential for determining whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of this assessment contradicts the National Planning Framework 4's directives regarding the protection of natural places and environmental quality. Furthermore, it diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of substantiating a lawful determination.

TOURISM

The application does not adequately assess the potential impacts on tourism, a vital sector for the Isle of Lewis economy. With tourism reliant on the area's stunning coastline, unspoiled landscapes, dark skies, and sense of remoteness, the omission of a thorough evaluation of how large-scale offshore infrastructure could affect visitor numbers, behaviours, and the overall economic contribution is concerning. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis provided.

Tourism on the Isle of Lewis has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not explore how the industrialisation of the seascape and the degradation of environmental quality may impact the Tourism Gross Value Added or the resilience of the broader economy.

Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or potentially jeopardise this established sector.

Furthermore, the application overlooks the critical role environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies to the visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism, are inadequately addressed. The lack of a Dark Skies Assessment exacerbates this gap, failing to provide a comprehensive understanding of the implications for a recognised and growing segment of the local economy.

In an island community where economic diversification is limited, the failure to properly evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been considered, contravening the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, examine the environmental factors influencing visitor behaviour, and recognise the island's economic reliance culminates in a significant evidential gap. This hinders a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly illustrates a significant failure to meet the principles of sustainable development, particularly when measured against statutory obligations, national policy, and evidential standards. Similar to the 2008 refusal of the Lewis Wind Power proposal, this application again highlights an unacceptable scale of industrialisation, yet it is now being put forward under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for the proposal is incomplete and unreliable, with critical gaps evident in baseline data. The ongoing use of an unspecified design envelope, alongside unverified mitigation measures, further complicates matters. Notably absent are assessments of key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment lacks the thoroughness needed to fully understand potential significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings within the application. The lack

of a compliant Island Communities Impact Assessment constitutes a violation of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete disclosure of the Social Impact Assessment represents a material omission that hinders a proper evaluation of the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inadequate for determination.

This proposal is also fundamentally at odds with National Planning Framework 4. It fails to provide adequate protections for biodiversity, natural landscapes, and cultural heritage, and does not demonstrate that health and wellbeing impacts are acceptable. Furthermore, it cannot substantiate a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed appropriately, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and potentially significant, as assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Finally, the proposal would lead to significant and irreversible changes to an already sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and detrimental effects on tourism represent permanent changes that cannot be adequately mitigated.

In conclusion, the application as it stands is both procedurally and substantively unfit for determination. The scale of the deficiencies in information, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent on these grounds or invokes the appropriate regulatory provisions to compel the submission of the necessary information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

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: 92C1189E

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 relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, rich cultural identity, and near-pristine environment. The scale and design of this application raise serious concerns regarding its adherence to statutory requirements, national policy, and sustainable development principles.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals that critical environmental data is missing, and baseline information is both limited and inconsistent. Key aspects of the proposal are not clearly defined, and the flexible design framework leaves uncertainty regarding potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are substantial policy conflicts present as well. The application 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 obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and challenge the competent authority's ability to determine that the development is acceptable from a policy perspective.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable evaluation of the proposed development's environmental consequences. A significant concern is the use of a

flexible Project Design Envelope, which lacks commitment to precise turbine specifications, configurations, or layouts. This introduces considerable uncertainty and obstructs a thorough application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately depict the development that will eventually be constructed, which hampers both public understanding and the competent authority's ability to grasp the genuine extent of environmental effects.

Moreover, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As consent is sought under the premise that any environmental harm will be rectified in the future, this prevents any meaningful assessment of their efficacy or an evaluation of residual impacts. This deferral of crucial information to post-consent phases is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly identified prior to determination.

There are also notable evidential deficiencies, with gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This generates uncertainty about the scale and significance of impacts, particularly when negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, specifically its requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The 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 assessment of marine ecology and protected species is significantly lacking, failing to provide a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically active marine system, yet the existing baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not establish a solid evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of disturbances from construction, noise, and increased human activity have not been sufficiently evaluated. This significant oversight undermines the conclusions regarding the absence of adverse

effects on this species.

In addition, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces a substantial detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such observations leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that conclusions about negligible or non-significant effects rest on assumptions rather than robust evidence. Moreover, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty surrounding the actual scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species involved. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be legally granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its findings. The application is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected.

There exists a critical contradiction within the application; the developer asserts that no significant adverse effects are anticipated while simultaneously advancing a case for Habitats Regulations derogation, a process triggered only when significant harm is expected. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The importance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the unclear understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional and significant risk, as it effectively creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies identified in the assessment also indicate a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, these various shortcomings render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Collectively, they hinder a robust evaluation of the impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a simplistic view, treating heritage as isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a notable deficiency in the treatment of culturally significant sites, specifically the active burial grounds at Dalmore, Bragar, and Barvas. These places serve as essential locations for burial and spiritual practice, yet the assessment considers them as static elements, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their vital role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and local traditions, which are integral to the area's identity. This significant omission hampers the understanding of the cultural impact of the development. The lack of assessment of these vital cultural elements further diminishes the validity of the evaluation.

Concerns also arise regarding community rights and engagement, particularly for the Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment, failing to meet established principles of community participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a legal 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 effects on the island community, rendering a lawful determination impossible.

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 to address both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to assess 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 adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency represents a significant evidential gap that hinders both public understanding and the competent authority's evaluation of social risks identified in the developer's research.

Residents are already reporting measurable stress, anxiety, and concern as a direct result of the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative in nature. However, the withholding of the complete assessment limits scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" appearing in the developer's own findings. Despite this recognition, the main application has not fully integrated these impacts or assigned them the appropriate weight. The absence of the

full Social Impact Assessment conceals the true social and human costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when they may affect community character and functioning. The failure to provide the complete dataset means the application does not offer a thorough evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence available suggests existing adverse effects that have not been adequately disclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The procedural implications of this non-disclosure are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming in the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside documented adverse impacts, renders the assessment both incomplete and unreliable. This reality prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted regarding seascape, landscape, and visual impacts is lacking in material detail and does not adequately consider the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would introduce an overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

There is a concerning inadequacy in how the application represents the scale of visual change. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately express the significance of this impact within the context of such a vulnerable landscape.

Moreover, there are methodological issues regarding the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not

comprehensively represent the most sensitive receptors or the worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context interlinked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further undermines any assertion of policy adherence.

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

In summary, the assessment fails to accurately capture the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises significant concerns regarding the incomplete assessment of construction and pollution risks, which fails to provide adequate detail for evaluating potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application places reliance on mitigation and contingency measures that are to be prepared post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially troubling considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Further compounding these issues is the uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application for development does not adequately evaluate the ecological or socio-economic impacts, particularly concerning these existing marine uses and habitats. It fails to demonstrate that they can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activities can simply be displaced without any consequences. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to manage the additional pressure. This omission is critical because it raises the risk of overfishing in other areas and poses potential economic ramifications for the local fishing fleet. Without a thorough and evidence-based assessment, the impacts on fisheries and local livelihoods cannot be accurately understood.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended timeframe is likely to cause disturbances across large distances, adversely affecting marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is particularly concerning, yet the application minimises the importance of these effects without providing sufficient supporting evidence.

There is a notable inconsistency within the application; while it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction 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.

Additionally, the assessment does not consider the cumulative impacts that result from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal signifies 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 hinder a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant onshore infrastructure elements that are crucial to the overall project, yet the assessment of these components is materially incomplete. The offshore turbines are inherently linked to the onshore works, including cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. This separation in assessment results in a fragmented approach that fails to reveal the true scale of environmental and socio-economic impacts.

A comprehensive evaluation of the potential impacts is lacking, particularly concerning excavation across deep peat areas, especially within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The application does not provide the necessary detailed assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively, and the division between offshore and onshore elements obscures the combined effects on peatlands, habitats, and local communities.

Moreover, the proposal poses significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that impacts on these important habitats have been thoroughly assessed or that adequate avoidance measures have been put in place, revealing a notable gap in the evidence regarding biodiversity protection.

Concerns surrounding carbon balance also arise from the disturbance of peatland, which can lead to the release of stored carbon, thereby creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or confirm that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is a lack of evidence in the application to indicate that the necessary consents or processes have been initiated, which raises significant questions about the deliverability and lawful implementation of the project.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application lacks an evaluation of the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and the

emerging astro-tourism sector. The absence of such an assessment indicates a clear gap in the landscape and environmental evaluation.

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

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

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

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

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

TOURISM

The application presents a serious shortcoming in its evaluation of tourism impacts, crucial for understanding the economic and social implications for the Isle of Lewis. Tourism in this area is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a distinct sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment does not quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this key sector.

The tourism industry has seen remarkable growth, expanding from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application fails to model the potential impacts of

seascape industrialisation and the decline in environmental quality on Tourism Gross Value Added and broader economic resilience. This lack of analysis hampers the ability to ascertain whether the proposed development would provide a net economic benefit or pose a threat to an established and flourishing sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, leading to a substantial gap in understanding the effects on a vital and expanding segment of the local economy.

In a community where economic diversification is limited, the oversight in assessing tourism impacts has broader repercussions for employment, local enterprises, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated in accordance with the requirements outlined in the Islands (Scotland) Act 2018.

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

In summary, the combined failures to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and account for the island's economic dependence lead to a significant evidential gap. This undermines the possibility of a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

A reliable evidential basis for this application is lacking. There are critical gaps in baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures is particularly troubling, as is the failure to consider essential impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the potential effects on tourism. As a result, the

Environmental Impact Assessment is incomplete and does not adequately inform on likely significant effects or residual impacts.

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

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

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

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

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

Additional Comments

As a newcomer to Lewis I have come to understand just how unique its landscape and marine life are. They are essential to making Lewis Lewis and are fundamental to the high quality of life here, and magnets for tourism. The construction of this project will inflict permanent, irreversible damage to the area, its landscape, seascape and the living beings (human and animal) that live here. It should not be allowed .

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: EF6C0C34

