

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 frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies related to planning, environmental concerns, cultural impacts, and procedural integrity. The proposed site is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and deep cultural roots. The scale and design of this project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, while baseline information is both limited and inconsistent, leaving essential components of the proposal inadequately defined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the provided documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and claims regarding negligible or non-significant effects lack robust evidential support.

Substantial conflicts with policy are evident. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national mandates to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory criteria necessary for consent and compromise the competent authority's ability to determine the development's policy acceptability.

The magnitude of this proposal is unprecedented for the area, with large turbines situated in close proximity to the shore, raising considerable concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate 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 National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives raises serious concerns regarding compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a coherent and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative

detailing the evolution of the project, which does not convincingly illustrate that less harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

Moreover, there is a notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not adequately demonstrate that the developer has considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be mitigated. The sensitivity of the West Lewis coastline, alongside the critical significance of proximity to shore in assessing impact, necessitates such analysis. The absence of this examination inhibits any determination that the proposed siting represents the least damaging option.

The shortcomings also affect the assessment of cable routing and landfall, revealing inadequate evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, which include culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy, coupled with insufficient comparative analysis, suggests that there has been no application of mitigation by design, thus relying predominantly on post-design mitigation measures.

Consequently, the application does not successfully demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This oversight constitutes 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 are available. In the absence of a comprehensive alternatives assessment, it cannot be definitively stated that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency significantly undermines alignment with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission, further contributing to the overarching conclusion that the application has not undergone adequate evaluation and thus cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately meet the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. There is a significant deficiency in the assessment of marine ecology and protected species, which provides an unreliable understanding of ecological receptors within the sensitive West Lewis coastal environment. The methodologies used are inadequate and do not sufficiently capture crucial aspects of species presence, behaviour, and habitat use, thereby undermining the evidential basis for evaluating potential impacts.

One critical shortcoming is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for

foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. Such omissions raise significant doubts about the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider these observations leads to an incomplete baseline and undermines 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 rather than robust evidence. Furthermore, the lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, including variations over seasons and interactions within the wider ecosystem. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

When considering these factors, the overall assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application lacks a solid evidential foundation. In light of the uncertainties introduced, consent for the application cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment that contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment lacks a robust evaluation of the implications regarding displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, indicating that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and reliance on

modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates a considerable risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations given the necessary attention.

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

Moreover, the deficiencies outlined reflect 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 affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly deficient, lacking the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This absence creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries available indicate that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are thus not speculative in nature. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” being highlighted in the developer's own findings. Despite this acknowledgement, the impacts have not been adequately incorporated into the main application nor assigned appropriate weight in the decision-making process. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance of benefits against harm.

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

The procedural implications of these deficiencies are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment 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 proposed introduction of large-scale turbines in close proximity to the West Lewis coastline raises significant concerns regarding its impact on the seascape, landscape, and visual amenity. This area is defined by its open Atlantic horizon, undeveloped character, and strong sense of remoteness. The planned industrial presence would create a continuous and dominant feature, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

The application inadequately represents the magnitude of the visual change that would occur. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. This level of impact and its significance in relation to the sensitive landscape have not been properly conveyed in the assessment.

Methodological concerns further undermine the application, particularly regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the actual magnitude of visual impact has been understated, thereby affecting the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Significant 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 application treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which calls for the protection of natural places and historic assets. The scale of proposed change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further questions any claims of compliance with policy.

It is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a change that is fundamental and permanent, rather than amenable to reduction through mitigation efforts.

Collectively, these deficiencies highlight the assessment's failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. This inadequacy prevents a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, which is necessary to evaluate environmental effects. Significant works on the seabed will take place in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application depends on mitigation and contingency measures that are to be developed after consent is granted, hindering any effective evaluation of their adequacy or effectiveness.

This approach raises serious concerns, particularly due to the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of damage from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide enough detail on how these incidents will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these effects. This uncertainty also relates to potential impacts on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures amplifies these issues. By postponing contingency planning to a time after consent, the application makes it difficult to evaluate whether adequate safeguards are in place for responding to pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively.

From a regulatory standpoint, this postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful decision cannot be made. The application also falls short of demonstrating adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment seriously deficient. These issues prevent a robust evaluation of construction and pollution risks, supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on local fisheries and marine ecosystems, as the assessment provided is incomplete and lacks a thorough examination of ecological and socio-economic effects. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and activities will be safeguarded from potential disruptions.

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed due to its failure to consider the full extent of impacts arising from what is a single integrated project. While the offshore turbines and onshore works are intrinsically linked, they have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore infrastructure includes cabling across protected moorland and construction of a substation near Stornoway, along with necessary access infrastructure through sensitive landscapes. This construction entails excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. However, the application does not provide a comprehensive assessment of these impacts, thereby preventing a full understanding of the project's overall environmental footprint.

By excluding or delaying the assessment of onshore impacts, the application fails to facilitate proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project be considered together; yet, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not adequately demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt that undermines the objectives of renewable energy development. The application has not sufficiently addressed this issue or shown that the overall carbon balance remains beneficial.

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

From a policy standpoint, the failure to assess the project as a 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 undermines the application.

Collectively, the separation of project components, the absence of comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this section of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a critical shortfall within the Environmental Impact Assessment. The West Lewis coastline boasts particularly dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will result in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is a significant oversight considering the essential nature of dark skies to the identity of the region and the burgeoning sectors of tourism, such as astro-tourism. Consequently, the absence of

these assessments creates a clear void in the overall evaluation of landscape and environmental impacts.

Furthermore, the impacts on nocturnal wildlife remain unexamined. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not feature any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting may impact these species or elevate mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it does not capture the nocturnal activity or the associated risks that species such as Kittiwakes face while foraging or migrating at night. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

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

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is significant, having grown from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, which accounts for up to 16% of the island's economy. However, the application in question fails to adequately evaluate the tourism impacts, neglecting to assess the economic and social consequences for this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's scenery, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the appeal of unspoiled landscapes and dark skies to the visitor experience. This gap is further exacerbated by the absence of a Dark Skies Assessment, which is essential for understanding the implications for nature-based

tourism and astro-tourism, both of which are emerging markets for the area.

In an island community with limited economic diversification, the neglect 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 means these economic vulnerabilities, as mandated by the Islands (Scotland) Act 2018, have not been properly evaluated.

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

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency culminate in a substantial evidential gap. This lack of thorough analysis inhibits a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal shows a failure to meet the requirements of sustainable development when examined against statutory duties, national policy, and evidential standards. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for determination in this application is incomplete and unreliable. There are significant gaps in baseline data, an undefined design envelope is being used, and reliance on unspecified mitigation measures is evident. Additionally, there is an omission of key impact pathways, including effects on nocturnal wildlife, the full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is insufficient and does not provide a clear understanding of likely significant effects or residual impacts.

Procedural failures are also present. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from assessing impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

There is direct conflict with National Planning Framework 4. The proposal does not demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails

to show acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

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

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

Considering all these issues, the application is procedurally and substantively unfit for determination. The considerable information deficiencies, combined with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or invoke the relevant regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 837B985C

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References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. 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.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues 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 must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material aspects and does not offer a complete, transparent, or reliable assessment of the potential environmental effects related to the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, creates substantial uncertainty. This uncertainty undermines the assessment's integrity and results in the presented impacts potentially not reflecting the actual development that will be constructed. Consequently, both the public and the competent authority are unable to gauge the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. By seeking consent under the premise that environmental harm will be resolved in the future, the application restricts any meaningful assessment of effectiveness or evaluation of residual impacts. This postponement of crucial information to post-consent phases is procedurally improper and at odds with the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly established before determination.

Additionally, the application suffers from significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. These shortcomings lead to uncertainty concerning 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 impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly regarding protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented within the application is insufficient and fails to comply with the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured and reasoned comparison of viable alternatives based on

their environmental effects, instead offering a narrative of project evolution. This narrative does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

The absence of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations is evident. Specifically, there is no indication that the developer has adequately considered the potential benefits of situating turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

These deficiencies are further apparent in the assessments of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. Areas of cultural and spiritual importance, such as Barvas Cemetery, have not been sufficiently considered. The failure to implement a clear avoidance strategy and the lack of comparative analysis indicate that mitigation by design has not been pursued, resulting instead in a reliance 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 represents a significant failure to adhere to the established mitigation hierarchy and limits the ability of the competent authority to ascertain whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this deficiency also undermines adherence to National Planning Framework 4, particularly with regard to the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot sustain 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 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 evaluation of community identity and cultural heritage surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the connections between environment, tradition, language, and community are deeply intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings are evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment describes them as static features, overlooking their ongoing significance and the effects of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their relevance to community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

There is additional evidence indicating that the proposal is viewed as a direct threat to

community identity and cohesion, with "cultural loss" acknowledged within the developer's own findings. Despite this acknowledgment, such impacts have not been fully incorporated into the main application or afforded the appropriate weight. The withholding of the complete Social Impact Assessment therefore clouds the true human and social costs associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a significant industrial presence that would change this character permanently and irreversibly. The current assessment of seascape, landscape, and visual impacts does not adequately capture the extent of this change or the sensitivity of the receiving environment.

The visual change anticipated from the application is not properly represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and compromising the naturalness and remoteness of the area. The assessment fails to convey the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not fully represent the most sensitive receptors

or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been underestimated, undermining the assessment's reliability.

Moreover, the assessment does not take into account the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated does not acknowledge their interdependence and leads to an incomplete understanding of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and diminishing their connection to the natural horizon. This impact extends beyond visual aspects to include broader cultural and spatial harm, which has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The proposed scale of change is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment undermines claims 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 overwhelming and unavoidable, leading to a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to adequately reflect the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking. It does not provide enough detail to understand the likely environmental effects. The proposal includes 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, it relies on mitigation and contingency measures to be created after consent, which hinders any proper evaluation of their adequacy or effectiveness.

This dependence on unspecified future measures raises concerns, especially given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient information

on how these risks will be prevented, controlled, or monitored.

There is uncertainty about the size and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the 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 issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether adequate measures are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent is granted, and without this information, a lawful determination cannot be achieved. The application also does not show compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and strengthen the view that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A major concern is the assumption that fishing activities can be displaced without any adverse consequences. The application does not provide evidence indicating that alternative fishing grounds exist, are accessible, or can support the added pressure from displaced fishermen. This is a critical oversight, as the potential for overfishing in other areas poses risks to the local fishing fleet's economic stability. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces significant risks to marine species, particularly due to the underwater noise produced during construction activities. The anticipated high-energy hammer piling over a prolonged period is expected to cause disturbances

across extensive areas, impacting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises considerable concerns, yet the application minimizes the importance of these effects, lacking adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is significantly lacking, failing to encompass the full range of impacts from what constitutes a single integrated project. The linkage between the offshore turbines and the onshore works is crucial, yet they are assessed independently, leading to a disjointed analysis that obscures the true magnitude of environmental and socio-economic consequences.

Onshore works entail cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through delicate landscapes. These operations involve excavation in areas of deep peat, particularly within Barvas Moor, which is an essential carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, which hampers a complete understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts restricts the proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; however, the distinct treatment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities, preventing a full understanding of the ramifications.

Moreover, there are serious concerns regarding the risk to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not provide assurances that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented, thereby creating a significant evidential gap in the context of biodiversity protection.

The proposal also raises alarm about carbon balance, as the disruption of peatland can release stored carbon, potentially generating a carbon debt that contradicts the goals of renewable energy development. The application fails to properly address this critical issue or to show that the overall carbon balance remains advantageous.

In addition, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The lack of evidence indicating that necessary consents or processes have been initiated raises serious concerns regarding the feasibility and lawful implementation of the project.

From a policy standpoint, the failure to assess the project as a unified whole, alongside the lack of demonstration that peatlands, habitats, and land use interests are protected, directly contradicts the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be effectively avoided or mitigated further undermines the integrity of the application.

Overall, the segregation of project components, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies in meeting the standards required for sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, highlighting an unacceptable scale of industrialisation. Notably, it is now presented within a regulatory framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are critical shortcomings in the evidential basis for the application, including substantial gaps in baseline data. The use of an undefined design envelope, dependence on unspecified mitigation measures, and failure to address key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects further contribute to an incomplete Environmental Impact Assessment. This inadequacy hampers the understanding of potential significant effects and residual impacts.

Procedural shortcomings are evident, notably in the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the

Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment represents a significant gap, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failings collectively render the application unsuitable for determination.

Conflicts with National Planning Framework 4 are apparent, as the proposal does not adequately protect biodiversity, natural environments, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore activities has not been thoroughly conducted, leaving effects on peatlands, carbon balance, habitats, and crofting land inadequately addressed.

Uncertainties regarding environmental risks persist. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential standard to conclusively rule out adverse effects has not been fulfilled, which invokes the precautionary principle and precludes a lawful finding that impacts are acceptable.

The proposal will induce significant and irreversible alterations to a highly sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse effects on tourism are all permanent consequences that cannot be satisfactorily mitigated.

In summary, this application is fundamentally flawed both procedurally and substantively. The extent of the informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision-making process. It is imperative that the competent authority either refuse consent based on these grounds or utilise the relevant regulatory measures to mandate the submission of the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0A148B59

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

Dear Sir/Madam

This objection is formally submitted against the proposed Spiorad na Mara Offshore Wind Farm application, which has been put forward under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. This development raises profound concerns regarding its compatibility with statutory requirements, national policy, and the principles underpinning sustainable development, given the unprecedented scale and proximity of the large turbines to the shoreline.

The Environmental Impact Assessment Report and its supporting documentation exhibit material deficiencies, lacking critical environmental data while presenting limited and inconsistent baseline information. Key components of the proposal remain undefined, leading to an unclear understanding of the likely significant effects. Furthermore, the use of a flexible design framework impedes the ability to assess the effectiveness of mitigation measures that have not yet been specified. Consequently, the documentation fails to provide a thorough or informed understanding of the potential environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

Clear conflicts with existing policies are evident. The application does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests required for consent and impede the competent authority's ability to determine the proposal's acceptability in policy terms.

The cumulative effect of insufficient information, reliance on undefined mitigation, evidential shortcomings, and blatant policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally lacking and fails to offer a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is not only highly sensitive but also biologically active. However, the baseline data provided is incomplete, and the methodologies used do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortfall pertains to otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leaves unassessed the potential effects arising from construction disturbance, noise, and increased activity. This oversight weakens any conclusions drawn regarding the absence of significant effects on this species.

There are also notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate these waters are used frequently. The neglect to incorporate or adequately consider such data results in an incomplete baseline, thereby undermining the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are grounded in assumptions rather than on robust evidence. The lack of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty introduced by these omissions prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application raises significant concerns regarding its reliability due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. It fails to demonstrate, to the required evidential standard, that internationally important seabird populations, many of which are already in decline, will not be adversely affected. The west coast of the Isle of Lewis supports these critical seabird populations, and the development is situated within key foraging areas and migratory pathways. However, the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

There is a fundamental contradiction in the application, where the developer concludes no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not adequately backed by the supporting evidence.

The assessment neglects to provide sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches leads to uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality, especially given incomplete baseline data and incomplete understanding of behavioural responses.

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

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

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

In conclusion, the assessment is ultimately unreliable due to its internal contradictions, methodological flaws, and insufficient evidence, all of which hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, failing to recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are interconnected. The application employs a simplistic approach, viewing heritage as separate, unchanging assets instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment characterises them merely as static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and neglects their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the longstanding connection between the community and its coastal environment. These aspects are vital to the area's identity but are completely omitted from the evaluation, representing a significant gap. Understanding the cultural impact of the development is impossible without considering these elements.

Additional concerns arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. The lack of meaningful engagement raises questions about the validity of the assessment and fails to align with established principles regarding participation in matters affecting cultural and environmental interests.

There is also a critical procedural shortcoming in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone hampers lawful decision-making.

From a policy standpoint, these deficiencies directly contradict the National Planning Framework 4, particularly concerning the protection of historic sites and places. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise living cultural practices, indicates a clear divergence from policy standards.

When considered collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application fails to provide a solid foundation for assessing the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development threatens the West Lewis coastline, characterised by its open Atlantic horizon and a sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, permanently altering the landscape and its natural character. This change is not merely visual but fundamentally transformative, undermining the very essence of what makes this area special.

The application fails to accurately convey the extent of the visual change. The sheer scale and proximity of the turbines would dominate views from residential areas and historic sites, significantly impacting visual amenity and eroding the qualities of naturalness and remoteness that define the region. Such oversight in the assessment neglects the profound significance of this impact within such a sensitive landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises questions about the reliability of the assessment and whether it truly captures the magnitude of the visual impact.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been appropriately assessed. Prominent sites such as the Calanais Standing Stones are integral to the wider landscape, interlinked with the Atlantic horizon both visually and spatially. By treating these assets as isolated, the assessment overlooks their interdependence and the impacts on their cultural significance.

The industrialisation of the seascape would disrupt the context in which these heritage assets are experienced, severing their connection to the natural horizon. This transformation represents not just a visual impact but a broader cultural and spatial harm that remains unexamined within the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural and historic assets. The scale of the proposed changes fails to meet the requirements to safeguard landscape character and visual amenity, as well as the settings of culturally significant sites. The lack of a thorough worst-case assessment further casts doubt on the proposal's compliance with established policies.

Lastly, it is evident that the impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure that their presence is dominant and unavoidable, resulting in changes that are fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These significant deficiencies highlight the proposal's incompatibility with the preservation of this vital landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change 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. Such an omission is particularly significant given the importance of dark skies to the identity of the area and to emerging sectors like astro-tourism. The failure to consider these impacts reveals a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of evaluation regarding the impacts on 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 risks. The application lacks a lighting impact assessment or phototaxis study and thus fails to evaluate how the proposed aviation lighting may affect these species or raise mortality rates.

Furthermore, the reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

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

Overall, 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 incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This proposal 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. It is now being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided for the assessment of this application is incomplete and unreliable. There exist critical deficiencies in baseline data, the proposal continues to employ an undefined design envelope, and it relies on unspecified mitigation measures. Additionally, there is a notable omission of essential impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a thorough understanding of likely significant effects or residual impacts.

Procedural failures are evident throughout the application process. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the incomplete disclosure of the Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for consideration.

This proposal is also at odds with National Planning Framework 4. It fails to establish protections for biodiversity, natural places, and cultural heritage; does not demonstrate that health and wellbeing impacts are acceptable; and lacks evidence of a net economic benefit due to the failure to model tourism impacts. The cumulative effects of both offshore and onshore components have not been adequately assessed, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations related to marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, internally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and obstructing a lawful determination of impact acceptability.

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

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, coupled with conflicts with policy and outstanding environmental uncertainties, precludes a lawful and evidence-based decision. The competent authority is therefore urged to either refuse consent based on these grounds or to employ the appropriate regulatory provisions to mandate the submission of the necessary missing information.

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

Additional Comments

As an incomer of over 20 years now, my choice to live here is bound to the magical unspoilt beauty of the beaches & abundance of wildlife that make this safe & preserved island & waters their home. It is a rare & stunning sanctuary to people & creatures in so many respects & needs to be protected as such I believe. It has become crucial to my health to go in the sea all year round & feel at one with nature in a wild place, as far away from major industrialisation & infrastructure as is possible. These turbines so close will ruin & disturb all of that.

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: 26CB5E0C

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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. 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.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues 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 must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, lacking a comprehensive, transparent, and dependable evaluation of the potential environmental repercussions of the proposal. The application utilises a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and hinders the consistent application of a worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts described may not accurately represent the development that would ultimately be constructed, hindering both the public and the competent authority from grasping the true extent of the environmental effects.

Furthermore, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that any environmental harm will be addressed later prevents any substantial evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies must be clearly identified prior to any decision-making.

There are also major evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information obstructs 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 necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to prove adherence to National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

In conclusion, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude 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 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A notable shortcoming is the treatment of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment incorrectly categorises them as static features. This oversight neglects their continued use and meaning, as well as the implications of development on their surroundings. Consequently, this misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their essential role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the social impacts, health, and wellbeing related to this proposal is critically lacking, which significantly undermines the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence of information creates a substantial evidential gap, inhibiting both public understanding and the ability of the competent authority to assess the social risks highlighted by the developer's own research.

Residents have reported experiencing stress, anxiety, and concern directly associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are firmly rooted in evidence, not conjecture. However, without access to the complete assessment, the findings cannot undergo adequate scrutiny, limiting the capacity to evaluate their significance during the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with indications of “cultural loss” emerging from the developer’s own findings. These impacts have not been thoroughly incorporated into the main application or afforded appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also compromises the integrity of the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they could affect community character and functioning. The absence of the complete data set results in a failure to provide a thorough evidential basis necessary for weighing the benefits against the harms.

From a policy standpoint, the application falls short in demonstrating adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been adequately disclosed. Consequently, it is impossible to show compliance with this policy without the full assessment.

The procedural ramifications are profound. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within the application and a failure to meet the evidential standards mandated by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with documented evidence of existing adverse impacts, renders the assessment incomplete and untrustworthy. This inadequacy obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks essential details for assessing construction and pollution risks, failing to meet the necessary standards for evaluating likely environmental impacts. It involves significant seabed preparation and installation work in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been submitted. Instead, the application depends on unspecified mitigation and contingency measures to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This reliance on undefined future measures is particularly alarming due to the sensitivity of the West Lewis coastline, known for its clean coastal waters and crucial habitats that are susceptible to sediment disturbance and pollution. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it does not furnish adequate information on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application hinders the evaluation of whether proper safeguards are established to address pollution incidents. This approach introduces procedural risk and weakens the ability of the competent authority to review environmental protection measures before making a determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination is unachievable. Additionally, the application fails to demonstrate compliance with policy standards concerning environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts render the assessment fundamentally deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against national policy, statutory duties, and evidential standards. This situation mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, although framed within a stronger policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not substantiate its claims.

There are significant deficiencies in the evidential basis for the application, including critical gaps in baseline data and the use of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The application also suffers from procedural inadequacies. Notably, the lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment represents a material shortfall. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. It fails to illustrate acceptable health and wellbeing impacts and cannot provide evidence of net economic benefits, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially severe. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and barring a lawful conclusion regarding the acceptability of impacts.

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

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

In light of these factors, 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: 7C706295

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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by an examination of the Environmental Impact Assessment Report and its associated documents, revealing material 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 notable for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shoreline, raise significant concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Furthermore, essential components of the proposal remain undefined. The adoption of a flexible design framework hampers a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust support.

Substantial conflicts with established policy are evident. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are fundamental to the statutory tests for consent and hinder the competent authority's capacity to deem the development acceptable within the policy framework.

The unprecedented scale of the proposal in this area, with large turbines located in close proximity to the shoreline, raises serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the shortcomings of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not offer a comprehensive or dependable account of the potential environmental effects associated with the proposal. The application's reliance on a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces significant uncertainty. This ambiguity undermines the assessment's integrity and may lead to a misrepresentation of the actual impacts of the development, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of the environmental consequences.

Furthermore, the application places considerable emphasis on unestablished mitigation measures, monitoring strategies, and management plans. Seeking consent under the assumption that environmental harm will be resolved later obstructs meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly delineated before any determination is made.

Additionally, the report exhibits serious evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of the impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information hampers a thorough understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, as it does not eliminate 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 National Planning Framework 4, including standards related to biodiversity protection and environmental integrity, since it cannot prove that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a fundamentally flawed assessment of marine ecology and protected species, significantly undermining the reliability of its conclusions. In particular, the methodologies used are inadequate for capturing the presence, behaviour, and habitat use of ecological receptors within the West Lewis coastal

environment, a region recognised for its biological activity and sensitivity. The data collected thus far is incomplete, failing to provide a comprehensive understanding necessary for evaluating potential impacts.

The assessment notably neglects to appropriately identify and assess the active use of coastal areas by otters, which are classified as a European Protected Species. This oversight means that their core foraging range and behavioural patterns have not been taken into account, leading to an incomplete evaluation of the potential effects arising from construction disturbance, noise, and increased activity. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a robust evidential basis.

Further weaknesses are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a significant detection bias. This method is particularly ineffective under Atlantic conditions, likely leading to an underestimation of the species' presence in the area. Established land-based observations indicate that these waters are frequently used by basking sharks, yet such data has not been adequately considered, resulting in an incomplete baseline for the assessment.

The shortcomings in methodology raise concerns about the validity of the conclusions indicating negligible or non-significant effects, as they are primarily based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates substantial uncertainty regarding the true risks posed to marine species and habitats.

Regulatory requirements are also not met, as the application fails to properly identify or assess protected species in accordance with the Environmental Impact Assessment regime and National Planning Framework 4. This level of uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, which should invoke the precautionary principle, thereby rendering the granting of consent unlawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, confirming that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that undermine its findings. Key foraging areas and migratory pathways critical to internationally important seabird populations on the west coast of the Isle of Lewis are inadequately addressed. Despite the serious decline of many of these species, the application fails to meet the necessary evidential standards to prove that they will not suffer adverse effects.

Within the application, there exists a troubling contradiction. The developer asserts that

there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation, a process that is only required when significant harm is anticipated. This contradiction raises doubts about the assessment's credibility and indicates that the conclusions drawn lack sufficient support from the evidence provided.

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 acknowledges the importance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding regarding behavioural responses.

The proposed siting of turbines within a recognised migratory corridor introduces a substantial risk by creating a barrier in a primary flight path utilized by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of continuous mortality within this corridor or the possible impacts on species that have relatively small global populations.

Regulatory concerns arise as the application does not fulfil the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which prevents a lawful conclusion supporting consent.

Additionally, the deficiencies noted signify 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 remain unaffected places the proposal in direct opposition to national policy.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included engagement with local residents through focus groups. However, the full report has not been published, leading to a significant evidential gap that hinders public understanding and the competent authority's ability to assess social risks identified in the developer's research. Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative, yet without the full assessment, there is limited capacity for proper scrutiny of these findings, making it difficult to ascertain

their significance in the decision-making process.

Moreover, the development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, such impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this nature, especially when they may affect community character and functioning. The failure to provide the full dataset results in an application that lacks a comprehensive evidential basis to weigh the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, existing adverse effects have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible. The procedural implications are profound, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission signifies a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable, which ultimately obstructs a lawful determination and supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is seriously inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would establish a continuous and overpowering industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately represent the extent of visual alteration expected from the project. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the inherent qualities of naturalness and remoteness. Moreover, the assessment does not sufficiently convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints, as evidence indicates that these may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This may result in an understatement of the magnitude of visual

impact, which compromises the overall reliability of the assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded in a broader landscape framework, visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these assets in isolation, failing to recognise their interdependence, which leads to a partial understanding of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This results in not only a visual impact but also a deeper cultural and spatial damage that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the safeguarding of natural areas and historic assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the change would be fundamental and permanent, not amenable to reduction to an acceptable level through mitigation measures.

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

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks thoroughness and does not adequately evaluate ecological or socio-economic impacts. The fishing industry is active off the West Lewis coast, which is home to a diverse marine ecosystem. However, the application does not prove that these habitats and uses can be safeguarded or sustained without significant disruption.

A major concern is the assumption that fishing activities can be moved without consequences. The application fails to provide evidence that alternative fishing grounds are available and accessible, or that they can handle additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas and might have broader economic repercussions for the local fishing fleet. The consequences for fisheries and livelihoods cannot be comprehensively understood without a clear and evidence-based assessment.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across considerable distances, impacting species such as dolphins. The potential disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without sufficient evidence to support such claims.

There is also a notable inconsistency in the application, as it acknowledges the need for licenses to allow harm to European Protected Species, while simultaneously stating that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

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

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

In summary, the insufficiency of evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions indicate that the assessment is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents significant shortcomings in meeting the principles of sustainable development when evaluated against national policy, statutory obligations, and evidential benchmarks. This application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, highlighting unacceptable levels of industrialisation. This current proposal is put forth under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

The evidential foundation for the application is incomplete and unreliable. There are notable deficiencies in baseline data, an unclear design envelope, unspecified mitigation measures, and key impact pathways that have not been addressed, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment fails to provide a thorough understanding of potential significant effects or residual impacts.

Procedural errors are also evident. The lack of a compliant Island Communities Impact

Assessment violates the statutory requirements set out in the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment is a significant flaw. These gaps hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with the National Planning Framework 4. It does not adequately ensure the protection of biodiversity, natural sites, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, it lacks evidence of a net economic benefit, particularly due to the absence of tourism impact assessments. The assessment of cumulative impacts from both offshore and onshore components is inadequate, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent. The necessary evidential threshold to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and thereby precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and adverse effects on tourism represent permanent changes that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 553C5AD1

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documentation, highlighting various deficiencies related to planning, environmental matters, cultural aspects, and procedural elements. 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 rich cultural identity. There are profound concerns regarding the scale, proximity, and design of the proposal, particularly in terms of its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the impacts on environmental, cultural, or community aspects, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are significant and clear policy conflicts at play. The proposal does not align 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 that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts are directly linked to the statutory tests necessary for consent and severely undermine the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns due to the large turbines being positioned in close proximity to the shoreline, leading to worries about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrates that the application is incomplete and incapable of receiving a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to definitive turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis and compromises the integrity of the assessment. Consequently, the potential impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from grasping the true scale of environmental effects.

Moreover, the application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs any meaningful assessment of effectiveness and residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation strategies must be clearly established prior to determination.

There are notable evidential shortcomings as well, including gaps in baseline data, methodological limitations, and a tendency to rely on assumptions instead of site-specific evidence. These issues result in uncertainty concerning 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 obscures a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal additionally does not demonstrate adherence to National Planning Framework 4, as it is unable to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies preclude a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally inadequate and fails to fulfil the statutory obligations set by the Environmental Impact Assessment regime. It does not provide a structured or reasoned evaluation of viable alternatives based on environmental implications. Instead, the application merely offers a narrative

description of the project's development. This method does not demonstrate that less harmful alternatives have been properly identified, assessed, and chosen over more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has genuinely explored the possibility of positioning turbines further offshore, an option that could likely minimise visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity, along with the critical relevance of proximity to shore in determining environmental impact, underscores the significance of this lack of analysis. Consequently, it is impossible to ascertain whether the proposed siting is indeed the least damaging option available.

This inadequacy extends to the examination of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been explored adequately to avoid or lessen impacts on sensitive areas, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a defined strategy for avoidance and the lack of comparative analysis suggest that mitigation through design has not been employed, relying instead on measures to mitigate after the design phase.

The failure to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure signifies a disregard for the established mitigation hierarchy. This shortcoming prevents the competent authority from determining the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal presents a sustainable or policy-compliant solution.

From a policy viewpoint, this deficiency raises significant concerns regarding compliance with National Planning Framework 4, especially in terms of safeguarding natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission that supports the conclusion that the application has not been sufficiently evaluated, thus cannot be legally determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a significant deficiency in its assessment of marine ecology and protected species, leading to an unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete. The methodologies used fail to capture the presence, behaviour, and habitat usage of the species accurately, which compromises the evidential foundation necessary for evaluating potential impacts.

One notable oversight is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. By neglecting to assess their core foraging range and behavioural patterns, the potential effects of construction-related

disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant effects on this species.

The assessment also inadequately addresses basking sharks, where reliance on aerial surveys leads to substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to land-based observations that indicate regular use of these waters. The failure to incorporate or adequately analyse such pertinent data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The insufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual level of risk to marine species and habitats.

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

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings inhibit a comprehensive evaluation of impacts on marine ecology and protected species, ultimately leading to the assertion that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted raises serious concerns regarding its reliability, primarily due to internal inconsistencies and methodological weaknesses. The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Despite this critical context, the application fails to meet the evidential threshold necessary to demonstrate that these species will not be adversely affected. It does not adequately evaluate the implications of displacement, collision risk, or habitat loss, leaving significant gaps in evidence.

A fundamental contradiction arises within the application itself, as the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is anticipated, thus casting doubt on the validity of the assessment and its

conclusions. Moreover, there is insufficient evidence provided that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is not fully considered, and reliance on modelling approaches contributes to uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents a further significant risk, effectively creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application does not sufficiently address the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential requirements needed to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, data gaps, and limitations inherent in the modelling render the standard of beyond reasonable scientific doubt unachievable. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

In addition, the identified deficiencies indicate 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 directly conflicts with national policy.

In summary, the assessment is fundamentally flawed and cannot support the determination of the application due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is 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 that treats heritage as a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment. This failure to consider their continued use and the implications of development on their setting leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding connection between the community and the

coastal environment. These elements are integral to the area's identity but are entirely absent from the evaluation, representing a considerable omission. Without acknowledging these factors, the cultural impact of the development cannot be fully grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity that aligns with the characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has been implemented. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination of the proposal.

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

Overall, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to 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 costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful review. Although the developer has commissioned a Social Impact Assessment, including focus group discussions with local residents, the full report remains unpublished. This creates a critical evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified by the developer's own investigation.

Residents are already reporting measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposal, as derived from direct engagement and therefore not speculative in nature. However, the absence of the complete assessment limits proper scrutiny of these findings and curtails the capacity to assess their implications during the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging the potential for

"cultural loss" in its findings. Despite this recognition, the impacts have not been sufficiently incorporated into the main application or afforded the appropriate weight in consideration. The failure to release the full Social Impact Assessment obscures the real human and social costs tied to the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health consequences is critical for developments of this magnitude, especially when community character and functionality may be at risk. The omission of the full dataset prevents the application from presenting a robust evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm; however, the available evidence reveals existing adverse effects that have not been adequately disclosed. Without access to the complete assessment, demonstrating compliance with this policy remains impossible.

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant shortcoming within the application and fails to satisfy the evidential requirements stipulated by the Environmental Impact Assessment framework.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project encompasses both offshore turbines and onshore infrastructure, yet the assessment of onshore elements is significantly incomplete. This fragmentation results in a failure to understand the full range of environmental and socio-economic impacts associated with what is fundamentally a single integrated project. Onshore works include the installation of cabling across protected moorland and the construction of a substation near Stornoway, alongside associated access infrastructure that traverses sensitive landscapes.

Critical to this proposal is the excavation that will occur across areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, thus preventing a thorough understanding of the overall environmental footprint of the project. The separate evaluations of offshore and onshore components mean that cumulative effects on peatlands, habitats, and local communities remain inadequately addressed.

Furthermore, significant risks to sensitive habitats exist, including machair systems and peatland environments, both of which are subject to specific policy protections. The application lacks demonstration of a full assessment of impacts on these habitats or the implementation of appropriate avoidance measures, resulting in a notable evidential gap in biodiversity protection.

The proposal also presents concerns surrounding carbon balance. Disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this critical issue or to show that the overall carbon balance will be maintained as beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence presented that demonstrates the initiation of necessary consents or processes, which raises doubts regarding the deliverability and lawful execution of the project.

From a policy standpoint, the inability to assess the project as a cohesive whole and to show adequate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The lack of ability to demonstrate that impacts can be avoided or mitigated further undermines the validity of the application.

Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, as it can lead to disorientation and increased collision

risks. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate the potential effects of aviation lighting on these species or the potential for increased mortality.

This lack of assessment is aggravated by the dependence on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting; yet this risk has gone unassessed. Without site-specific night-time data, there remains a critical gap in understanding the ecological impacts.

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development, as it does not satisfy statutory duties or national policy. This proposal raises the same concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls short.

There are significant gaps in the evidential basis provided for this application. It lacks comprehensive baseline data and continues to rely on an undefined design envelope. Mitigation measures have not been clearly specified, and important impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. As a result, the Environmental Impact Assessment is inadequate, leaving uncertainties about the likely significant effects and any residual impacts.

Furthermore, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact

Assessment constitutes a significant omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The numerous deficiencies in information, combined with conflicts in policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I have family buried in Cladh Bhràdhagair and I'm horrified by the proposition. Visualisations of this project make it clear that it would dominate the skyline and disrupt the peace which is so important in a place like this.

I also find the tokenistic use of gaelic offensive, given how local gaelic voices have been ignored and undervalued.

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: 2B8716ED

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts associated with this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to conclude that the development is acceptable in policy terms.

Taken together, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In these circumstances, it is imperative that the precautionary principle applies.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential elements and does not offer a comprehensive, transparent, or dependable account of the likely environmental consequences of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment and leading to a

situation where the impacts outlined may not correspond to the actual development constructed. As a result, both the public and the competent authority are left without a true understanding of the potential environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that any environmental harm will be mitigated later prevents a thorough evaluation of the effectiveness of these measures and an assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and conflicts with the core objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to any determination.

Further complicating the situation are substantial evidential deficiencies, such as gaps in baseline data, limitations within the methodology employed, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly with regard to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors present. This marine system is known for its high sensitivity and biological activity. However, the baseline data is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A significant oversight is the assessment of otters, which are classified as a European

Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the potential effects of construction disturbances, noise, and increased activity. This gap undermines any claims regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the methodology relies on aerial surveys that carry inherent detection biases, particularly under Atlantic conditions. This approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or appropriately assess such data contributes to an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues result in assertions of negligible or non-significant effects being grounded in assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has inadequately identified and assessed protected species. The uncertainty created by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

In summary, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively undermine the reliability of the assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

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

The assessment fails to demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of their feeding grounds is not adequately addressed, and the reliance on modelling techniques introduces uncertainties, particularly for species facing severe declines, like Kittiwakes and Fulmars. Moreover, the methodologies employed may underestimate mortality rates due to incomplete baseline data and a lack of understanding of behavioural responses.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm presents a significant failure in meeting the criteria for sustainable development, as outlined in statutory duties and national policy. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. This new proposal is put forth under a more stringent policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

This application lacks a comprehensive and dependable evidential foundation for its assessment. Notable deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways—such as effects on nocturnal wildlife, complete onshore infrastructure, and tourism—are evident. Consequently, the Environmental Impact Assessment is inadequate, preventing a thorough understanding of significant effects or residual impacts.

Furthermore, there are evident procedural shortcomings. The failure to include a compliant Island Communities Impact Assessment is a violation of statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial omission. These flaws hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contradicts the National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain ambiguous and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

Moreover, the proposal would bring about 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 sufficiently mitigated.

In summary, the application is unfit for determination, both procedurally and substantively. The magnitude of information deficits, coupled with policy inconsistencies and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, the competent authority must either reject the application on these bases or invoke appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

In the context of Scotland as a whole, the location of this proposed windfarm seems to be quite wrong.

There will be too much electricity generated to be used locally resulting in a commercial requirement for extensive cables to connect to the grid, down through Scotland to where the electricity is needed.

The energy policy, and related planning decisions should be developed in a framework of what is best for the country as a whole, taking into account the significance of the

wildlife and habitats that will be disrupted should this go ahead.

Please reconsider this application, taking into account all the outcomes.

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: 2BF09B42

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 relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal 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. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Moreover, the application lacks an adequate evidential basis necessary for lawful determination. Missing critical environmental data, inconsistent baseline information, and undefined key aspects of the proposal contribute to a significant lack of clarity. The use of a flexible design framework complicates understanding of potential significant effects, while unestablished mitigation measures leave their efficacy unassessed. Consequently, this documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible effects unsupported by robust evidence.

Furthermore, there are evident policy conflicts present within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate 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 presents significant deficiencies, failing to deliver a complete, transparent, and dependable analysis of the potential environmental effects of the proposed development. A major concern is the use of a flexible Project Design Envelope, which lacks commitment to precise turbine sizes, layouts, or configurations. This introduces considerable uncertainty, hindering the application of a worst-case scenario approach. Consequently, the integrity of the assessment is compromised, preventing both the public and the competent authority from gaining an accurate understanding of the actual environmental impacts that may arise from the development.

Moreover, the application is heavily reliant on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This approach seeks consent on the premise that environmental harm will be addressed at a future stage, thereby obstructing any meaningful evaluation of the effectiveness of such measures or the assessment of residual impacts. Deferring critical information to stages beyond consent is procedurally unacceptable, contravening the fundamental aim of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated prior to decision-making.

There are also substantial gaps in evidence, including shortcomings in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps create uncertainty about the scale and significance of impacts, particularly in instances where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts, fostering a level of scientific uncertainty that contradicts statutory obligations.

Consequently, the application does not satisfy the evidential standards set forth under the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of 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 has not been established that impacts have been fully evaluated or that appropriate safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the absence of defined mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. Such shortcomings inhibit a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make a fully informed decision based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to deliver a comprehensive and trustworthy understanding of ecological receptors

within the West Lewis coastal environment. This marine system is particularly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not sufficiently capture essential aspects such as species presence, behaviour, and habitat use. Consequently, the assessment does not establish a solid evidential foundation for evaluating potential impacts.

One critical gap is the assessment related to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal areas for foraging and movement. The oversight concerning their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Additional shortcomings are evident in the evaluation of basking sharks. The dependence on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider relevant data results in an incomplete baseline, further compromising the reliability of the conclusions presented.

These methodological weaknesses culminate in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a troubling inconsistency, asserting that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment and

indicates that the conclusions drawn lack support from the underlying evidence. Moreover, the assessment inadequately addresses the consequences for seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. It fails to sufficiently consider the significance of these feeding grounds, particularly given that the reliance on modelling approaches introduces uncertainty, especially for species in decline, including Kittiwakes and Fulmars.

The ornithological assessment is fundamentally flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not convincingly demonstrate that these species will not be adversely impacted. Critical foraging areas and migratory pathways are situated near the development, yet the assessment falls short in evaluating the implications of displacement, collision risks, or habitat loss.

Additionally, the siting of turbines within a recognized migratory corridor creates a significant risk, forming a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of sustained mortality within this corridor and the potential effects on species with relatively small global populations.

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

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 convincingly demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy. Ultimately, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and lack of adequate evidence. These failures obstruct a thorough evaluation of the impacts and support the overall 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 developer's commissioned Social Impact Assessment included focus groups with local residents, yet the full report remains unpublished. This situation creates a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's own research. Available summaries indicate that residents are experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts, derived

from direct engagement, are factual rather than speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal threatens community identity and cohesion, with “cultural loss” identified in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the full dataset means the application fails to provide a complete evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development is expected to support positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is not possible.

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

In summary, the failure to disclose the full Social Impact Assessment, combined with existing evidence of adverse impacts, leads to an incomplete and unreliable evaluation. This situation prevents a lawful determination and underscores that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The current application presents significant shortcomings in its assessment of seascape, landscape, and visual impacts. It inadequately captures the scale of change and overlooks the sensitivity of the environment in question. The West Lewis coastline, characterised by its expansive Atlantic horizon and undeveloped landscape, possesses a profound sense of remoteness. Introducing large-scale turbines near the shore would result in a continuous industrial presence, fundamentally altering this cherished character and leading to a permanent transformation of the landscape.

The visual changes projected are not sufficiently articulated in the application. The

sheer scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the intrinsic qualities of naturalness and remoteness. The assessment fails to communicate the extent of this impact and its significance within such a sensitive landscape context.

There are also notable methodological issues regarding the chosen visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or represent worst-case scenarios, particularly concerning culturally significant heritage sites and valuable landscapes. This raises concerns that the assessment may downplay the true magnitude of the visual impact, casting doubt on its reliability.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context, linked to the Atlantic horizon through visual and spatial relationships. By treating these sites as isolated entities, the assessment misses the crucial interdependence that informs their cultural significance, leading to an incomplete evaluation of impacts on their settings.

The industrialisation of the seascape poses a threat to these relationships, fundamentally altering how heritage assets are perceived and disconnecting them from their natural horizon. This situation represents more than just a visual impact; it inflicts a cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the preservation of natural places and historic assets. The magnitude of the proposed change is at odds with the imperative to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

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

In summary, the assessment fails to accurately convey the scale of the impact, the sensitivity of the environment, and the intertwined 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 vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans significantly undermines the assessment of construction and pollution risks associated with the proposal. This lack of detail is particularly

troubling given the extensive seabed preparation and installation works planned within a high-energy Atlantic environment. The application's reliance on mitigation and contingency measures that will only be formulated post-consent hinders a meaningful evaluation of their potential adequacy or effectiveness.

This situation is exacerbated by 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. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Moreover, there exists considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies prevents a clear determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the 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. The decision to defer contingency planning until after consent has been granted limits the ability to ascertain whether appropriate safeguards are available to address potential pollution events. This creates procedural risk and weakens the competent authority's capacity to evaluate environmental protection measures at the moment of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and mitigation must occur prior to consent, and the absence of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Ultimately, the combined shortcomings of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, thereby reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a thorough evaluation of the ecological or socio-economic impacts, failing to demonstrate that these important habitats and activities can be protected without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. There is no evidence presented that alternative fishing grounds are

available or able to handle increased pressure. This lack of information is critical, as displacement could lead to overfishing in other areas and potentially have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, affecting species such as dolphins. The application downplays the predicted impact on a significant portion of the local bottlenose dolphin population, raising serious concerns without adequate supporting evidence.

Furthermore, there is an inconsistency in the application regarding the need for licences to harm European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

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

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings prevent a thorough evaluation of 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. 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 represents a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development 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, fundamentally altering the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape

character, or the experiences of residents and visitors. This oversight is particularly concerning given the significance of dark skies to the region's identity and the potential for growth in sectors like astro-tourism. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is a complete lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or a phototaxis study, meaning it fails to evaluate how aviation lighting might affect these species or lead to increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities or the associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific data related to night-time conditions leads to a critical void in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 in terms of protecting natural areas and ensuring environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time is a vital aspect of the environment.

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

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it fails to provide a quantified analysis of how large-scale offshore infrastructure could potentially affect visitor numbers, their behaviour, or the overall economic contribution of tourism, which is a key sector of the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this, the application does not model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the community.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory duties and national policy. It echoes the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is positioned under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

A significant concern is the absence of a comprehensive and reliable evidential basis for the application's determination. Critical gaps exist in baseline data, and the continued reference to an undefined design envelope raises questions. Mitigation measures mentioned are not specified, and important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, hindering an understanding of potential significant effects and residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of the complete Social Impact Assessment is a material omission that inhibits the competent authority's ability to

evaluate impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Additionally, the proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural landscapes, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their implications for 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 sometimes inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent based on these grounds or employ the relevant regulatory measures to demand the submission of the necessary information.

Thus, 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: F47DF19C

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in the application is fundamentally flawed and cannot be relied upon to provide an accurate understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both highly sensitive and biologically vibrant, yet the baseline data is insufficient and the methodologies used do not effectively capture essential aspects of species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for determining the potential impacts.

Significantly, the assessment fails to appropriately recognise the presence of otters, a species protected under European law, in relation to their foraging and movement along coastal regions. The oversight in accounting for their core foraging range and behavioural patterns means that the potential impacts from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This oversight undermines any claims regarding the absence of significant impacts on otters.

In addition, the assessment of basking sharks reveals further shortcomings, particularly due to the reliance on aerial surveys which are subject to substantial detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate regular usage of these waters. The exclusion or inadequate consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological deficiencies lead to conclusions regarding negligible or non-significant effects being rooted in assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful examination of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty surrounding the real level of risk to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to accurately identify and assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

Overall, the combination of insufficient baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species and reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline.

However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as 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 implications of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable 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 absence of the full Social Impact Assessment significantly undermines the ability of the competent authority to conduct a thorough socio-economic and health evaluation.

This omission is not merely procedural; it restricts the evidential framework required for assessing the proposal's impact comprehensively. Without access to the complete dataset, the application falls short of meeting the evidential standards established under the Environmental Impact Assessment regime.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The application significantly underrepresents the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not adequately convey the level of impact or its significance, particularly given the sensitivity of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impacts have been understated, which undermines the credibility of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

It is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Consequently, the resulting changes would be fundamental and permanent, unable to be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

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

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive 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 detail on 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 is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures raises additional concerns. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether appropriate safeguards are in place to respond to pollution events. This creates procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated prior to consent, and when this information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the application reveals several critical deficiencies that undermine its reliability and comprehensiveness. Firstly, it is clear that there is an insufficient assessment of fisheries and marine life, failing to robustly evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry, yet the application does not adequately demonstrate that these vital uses and habitats can be preserved without causing significant disruption.

A particularly concerning aspect is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence that there are alternative fishing grounds that are accessible and able to accommodate additional pressure. This gap in information is important, as it raises the risk of overfishing in other areas and may lead to broader economic consequences for the local fishing fleet. Without a detailed, evidence-based assessment, the implications for fisheries and livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, notably through the noise generated by underwater construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, particularly impacting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application minimises the importance of these effects and lacks adequate supporting evidence.

Additionally, there exists a contradiction within the application, wherein it acknowledges the necessity of licences to permit harm to European Protected Species, while simultaneously characterising such impacts as negligible. This inconsistency undermines the credibility of the assessment and raises substantial concerns regarding compliance with the Habitats Regulations, particularly where harm is expected to an extent that necessitates legal authorisation.

The application further neglects to address cumulative impacts that arise from a variety of pressures, including habitat disturbance, 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.

Finally, from a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and 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 prevents any assertion that the proposal constitutes sustainable development.

In summary, the absence of sufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inherent inconsistencies render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 total contribution of tourism to the Isle of Lewis economy reached over £81.5 million, with this sector supporting more than 1,000 jobs and accounting for up to 16% of the island's economy, an increase from £65 million in 2017. Despite this growth, the application fails to model the potential impact of large-scale offshore infrastructure on tourism, particularly regarding visitor numbers and the overall economic contribution of

the sector. The assessment does not provide a quantified evaluation of how the industrialisation of the seascape and a reduction in environmental quality could affect Tourism Gross Value Added or the resilience of the local economy.

Tourism heavily relies on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery; however, it neglects to assess the importance of these environmental qualities in influencing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism. Furthermore, the lack of a Dark Skies Assessment exacerbates the deficiencies in the application, leaving a critical gap in understanding the effects on a recognized and expanding segment of the local economy.

In light of the limited economic diversification within the island community, the disregard for tourism impacts presents broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that the economic vulnerabilities inherent in the region have not been sufficiently evaluated, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding the economic impact and the necessity to exhibit a net benefit. It contradicts strategic objectives that identify tourism as a priority growth sector, lacking adequate evidence for the competent authority to assess the economic ramifications of the proposed development.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and take into account the island's economic dependence results in a substantial evidential gap. This gap obstructs a thorough evaluation of economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the principles of sustainable development as outlined by statutory duties and national policy. This application mirrors the key concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for this application is notably absent. There are serious deficiencies in baseline data, the use of an undefined design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways. These include nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a full understanding of potential significant effects or residual impacts.

Procedural inadequacies 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 share the complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the 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, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The requisite evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposed development would lead to considerable 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 connections, and the adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

In light of these factors, the application is fundamentally and procedurally unsuitable for determination. The vast information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should therefore refuse consent on these bases or invoke relevant regulatory provisions to necessitate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3D07F1D8

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. Concerns arise from a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

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

Moreover, the application presents clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material aspects and does not offer a complete, transparent, or reliable assessment of the potential environmental effects related to the proposal. The introduction of a flexible Project

Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, creates substantial uncertainty. This uncertainty undermines the assessment's integrity and results in the presented impacts potentially not reflecting the actual development that will be constructed. Consequently, both the public and the competent authority are unable to gauge the true scale of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. By seeking consent under the premise that environmental harm will be resolved in the future, the application restricts any meaningful assessment of effectiveness or evaluation of residual impacts. This postponement of crucial information to post-consent phases is procedurally improper and at odds with the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly established before determination.

Additionally, the application suffers from significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. These shortcomings lead to uncertainty concerning 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 impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, particularly regarding protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a thorough assessment of alternatives, failing to comply with the requirements of the Environmental Impact Assessment regime. Instead of a structured evaluation of realistic options based on their environmental impacts, the application presents a narrative about the evolution of the project. This approach does not adequately show that less harmful alternatives have been identified, assessed, and preferred over more damaging solutions.

Furthermore, there is no clear, evidence-based comparison of alternative locations, scales of development, or design configurations. The application does not illustrate 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 critical role of proximity to shore in assessing impact, the lack of such analysis obstructs the conclusion that the proposed location is the least damaging.

These inadequacies extend to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been applied, resulting in reliance on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines alignment with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not undergone adequate evaluation and therefore cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a comprehensive or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of the species within this marine system. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight involves the otters, classified as a European Protected Species, where the application neglects to appropriately acknowledge and assess their usage of coastal regions for foraging and movement. Without considering their core foraging range and behavioural tendencies, the assessment does not adequately address the possible impacts of construction-related disturbances, noise, and increased human activity. This shortcoming undermines any conclusions drawn about the lack of

significant effects on this particular species.

Moreover, the evaluation of basking sharks reveals further deficiencies; reliance on aerial surveys leads to substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that suggest these waters are frequently used by the species. The oversight in incorporating or accurately considering such information leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that conclusions regarding negligible or non-significant effects are largely based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and the broader ecosystem interactions. This uncertainty clouds the true extent of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been no thorough identification or assessment of protected species. The uncertainty generated by these deficiencies obstructs the exclusion of adverse effects beyond reasonable scientific doubt, necessitating adherence to the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately accounts for the significance of these feeding grounds, relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional and significant risk, functioning as a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application fails to adequately consider the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A notable shortcoming is the treatment of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment incorrectly categorises them as static features. This oversight neglects their continued use and meaning, as well as the implications of development on their surroundings. Consequently, this misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their essential role in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Furthermore, evidence indicates that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Despite the recognition of these impacts, they have not been fully integrated into the main application or given the appropriate weight they deserve. The withholding of the

complete Social Impact Assessment obscures the true human and social costs associated with the development, which is crucial information for stakeholders.

The absence of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is essential for developments of this nature, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis required to assess the balance between the proposed benefits and potential harms.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 does not adequately reflect the scale of change or the sensitivity of this environment. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the character of the landscape and resulting in a permanent transformation.

The application fails to accurately portray the magnitude of the visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This domination would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not properly convey this level of impact or its significance in such a sensitive landscape.

Moreover, there are concerns regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly

concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another deficiency is the lack of assessment of the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated assets without recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt the relationships between these heritage assets and alter the context in which they are experienced. This disruption not only represents a visual impact but also a broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, making it impossible to reduce to an acceptable level through mitigation.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These 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 evaluation of construction and pollution risks related to the proposal is severely lacking in detail, which hinders a proper assessment of its likely environmental impacts. Significant seabed preparation and installation are planned within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is notable. Instead, the application relies on mitigation and contingency measures that are to be created after consent is granted, limiting any meaningful assessment of their sufficiency or effectiveness beforehand.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks such as

sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate details on how these risks will be prevented, managed, or monitored.

There is significant uncertainty regarding the size and behaviour of sediment plumes that might result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application removes the opportunity to evaluate whether adequate measures are in place to address pollution events, thus introducing procedural risk. This situation undermines the competent authority's ability to assess the environmental protection measures effectively at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed before consent can be granted. The application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainties surrounding potential impacts all contribute to a materially inadequate assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The assessment provided regarding fisheries and marine life lacks thoroughness and fails to deliver a strong evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these crucial habitats and uses can be safeguarded or sustained without causing significant disruption.

One primary concern lies in the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to absorb additional pressure. This omission is crucial, as the potential for displacement raises the risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. An evidence-based assessment is essential to fully understand the impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned over an extended period is expected to disturb marine life over large areas, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

Additionally, there is a striking inconsistency in the application concerning the necessity for licences to permit harm to European Protected Species, even as such impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises substantial concerns regarding adherence to the Habitats Regulations, particularly where harm is expected to occur to a degree that requires legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the 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 absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is noted for its exceptionally dark skies, which are essential to the region's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, which would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly notable given the significance of dark skies to the area's identity and the growth of tourism sectors, such as astro-tourism. The neglect of these impacts represents a shortfall in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be

highly sensitive to artificial lighting, which can result in disorientation and heightened collision risks. The application does not include any lighting impact assessment or phototaxis study, thereby failing to assess the potential effects of aviation lighting on these species and the risk of increased mortality.

This deficiency is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are similarly vulnerable to disorientation due to artificial lighting, yet this risk has not been addressed. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

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

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife signifies a major evidential deficiency. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to facilitate 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 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.

Additional Comments

I am writing to object to the proposed N4 “Spiorad na Mara” wind farm.

Landscape and Visual Impact

This is a place of outstanding natural beauty, and this development would fundamentally change it. Turbines of this scale, so close to shore, would dominate the horizon from Lewis and turn an open, unspoilt landscape into an industrial one.

Scale and Proximity

At this size and distance, there is no real mitigation. These are not distant features — they will be a constant and intrusive presence. The scale feels completely out of proportion to the setting.

Wildlife and Environment

I am concerned about the impact on bird and marine life. This is a sensitive

environment, and a development on this scale cannot be considered low impact. The potential effects on habitats and species need far more weight.

Tourism and Local Economy Tourism in the Western Isles depends heavily on the landscape, wildlife and sense of remoteness that make this area unique. People visit because it feels wild and unspoilt. Developments on this scale risk damaging exactly what supports many local businesses and communities.

Character of the Area

The coastline, the sense of space, and the wildlife are what make this area special. Once that character is altered, it cannot be restored.

Conclusion

I am not against renewable energy, but this is not the right place for a project of this size. For these reasons, I object to the proposal.

Yours faithfully

[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: F1DB5995

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.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

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

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These deficiencies hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 shortcomings in the assessment of cultural heritage and community identity are glaring and cannot be overlooked. It fails to acknowledge the West Lewis coastline as a vibrant cultural landscape, where the environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a limited perspective, treating heritage merely as a collection of isolated, static assets. This narrow view neglects the ongoing social, cultural, and spiritual functions these sites serve within the community.

Particularly concerning is the treatment of significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places of burial and spiritual practice. However, the assessment categorises them as static features, overlooking their continued use and significance, along with the potential impacts of development on their surrounding environment. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their vital role in community life.

Additionally, the failure to assess intangible cultural heritage is troubling. Elements like the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment are integral to the area's identity, yet they are entirely omitted from the assessment. This absence represents a significant gap, hindering a proper understanding of the development's cultural impact.

There is also a critical lack of community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent undertaken, undermining the legitimacy of the assessment and neglecting established principles for participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment is a procedural failure that cannot be ignored. This assessment is a statutory requirement under the Islands (Scotland) Act 2018, and without it, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone invalidates a lawful determination.

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

Overall, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The true cultural impacts of the development remain unassessed, and the application does not provide an adequate foundation for understanding the real cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents have reported experiencing noticeable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts stem directly from local engagement and are therefore grounded in reality rather than speculation. However, the inability to access the comprehensive assessment restricts the opportunity for proper scrutiny of the findings, consequently limiting the capacity to ascertain their relevance in the decision-making process.

Furthermore, there are indications that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite the seriousness of these implications, they have not been adequately incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs of the development.

The lack of transparency has detrimental effects on the Environmental Impact Assessment process. A thorough understanding of social, economic, and health repercussions is crucial for developments of this magnitude, especially where community character and functionality may be impacted. By not providing the entire dataset, the application fails to deliver a comprehensive evidential basis for evaluating the balance of 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 mitigate harm, yet available evidence suggests existing adverse effects that have not been fully disclosed. In the absence of the full assessment, it cannot be shown that compliance with this policy is achieved.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health assessment without the complete Social Impact Assessment. This constitutes a significant omission within the application and indicates a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with the evidence of current negative impacts, leads to an incomplete and unreliable evaluation. This hinders a lawful determination and strengthens the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is seriously inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would establish a continuous and overpowering industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately represent the extent of visual alteration expected from the project. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the inherent qualities of naturalness and remoteness. Moreover, the assessment does not sufficiently convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints, as evidence indicates that these may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This may result in an understatement of the magnitude of visual impact, which compromises the overall reliability of the assessment.

Additionally, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded in a broader landscape framework, visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these assets in isolation, failing to recognise their interdependence, which leads to a partial understanding of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This results in not only a visual impact but also a deeper cultural and spatial damage that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the safeguarding of natural areas and historic assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the change would be fundamental and permanent, not amenable to reduction to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected relationship between landscape

and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application is inadequate, failing to provide a thorough assessment of ecological and socio-economic impacts. The fishing industry along the West Lewis coast is active and vital, and the marine ecosystem in these waters is diverse. However, the proposal does not adequately demonstrate that these essential habitats and activities can be preserved without significant disruption.

One major concern is the assumption that fishing activities can be displaced without adverse effects. The application lacks any evidence that alternative fishing grounds exist, are accessible, or have the capacity to support increased pressure. This critical omission poses risks of overfishing in alternative locations and may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the implications for fisheries and associated livelihoods remain unclear.

The proposal also introduces considerable risks to marine species due to the anticipated underwater noise from construction activities. The prolonged use of high-energy hammer piling is likely to create disturbances over large distances, particularly affecting dolphins. The projected disruption to a significant segment of the local bottlenose dolphin population is alarming, yet the application minimizes these effects without sufficient supporting evidence.

There exists a notable contradiction within the application regarding the need for licenses to harm European Protected Species, while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly when harm is anticipated at a level that necessitates legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts resulting from a combination of factors, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the proposed development can coexist with current marine users or avoid unacceptable harm to marine biodiversity, precluding any conclusion that the project embodies sustainable development.

In summary, the deficiencies surrounding the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the

assessment flawed and unreliable. These gaps hinder a comprehensive evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting will produce a continuous and intrusive “wall of light” effect on the western horizon, fundamentally transforming the night-time environment.

Importantly, the proposal fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially concerning due to the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The absence of this assessment results in a considerable gap in the overall environmental and landscape evaluation.

Moreover, the application does not examine the consequences of artificial lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial light due to phototaxis, which increases disorientation and collision risks. The lack of a lighting impact assessment or a phototaxis study means that the proposal does not adequately evaluate how aviation lighting may endanger these species or contribute to mortality.

This gap is exacerbated by the use of daytime survey data for the ornithological assessment, which fails to account for nocturnal activities and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data further complicates the understanding of ecological impacts.

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

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly concerning the protection of natural places and the quality of the environment. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential component of the environment.

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife reveals a substantial evidential gap. The deficiency in baseline data, impact

modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

The 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 fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the critical issues that prompted the refusal of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. Despite being presented within a more robust policy context, which prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A thorough evidential basis for determination is lacking. There are significant gaps in baseline data and an undefined design envelope, alongside an over-reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, are notably omitted. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a complete understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal is at odds with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural habitats, and cultural heritage, fails to validate 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 both offshore and onshore components have not been sufficiently assessed, thereby obscuring the potential 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, in some instances, lack internal consistency. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and inhibits a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal is poised to cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the implications for tourism signify permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority should refuse consent on these grounds or invoke the appropriate

regulatory provisions to mandate the submission of the necessary information.

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

Additional Comments

I am writing to formally object to the proposed Spiorad na Mara (N4) Offshore Wind Farm development off the west coast of Lewis.

This proposal represents a development of unprecedented scale for the area, with up to 66 turbines reaching heights of approximately 380 metres. Such an industrialisation of the seascape would have a devastating and irreversible impact on the island's unique culture and landscape. The identity of Lewis is deeply rooted in its natural environment—its open horizons, unspoilt coastlines, and strong connection between people and place. The visual dominance of turbines of this magnitude would fundamentally alter that relationship, eroding the very character that defines the island and diminishing its cultural heritage.

In addition to the visual and cultural harm, there is growing evidence that large-scale wind developments can have detrimental effects on the physical health and wellbeing of nearby populations. Given the scale and proximity of this proposal, it is reasonable to conclude that the entire island community could be affected. The potential for noise disturbance, shadow flicker, and associated stress-related impacts cannot be dismissed, particularly in a setting where communities have historically enjoyed a high-quality natural living environment.

Furthermore, there appears to be a complete lack of clear and adequate plans for rehousing or compensating residents who may be adversely affected by this development. This raises serious concerns about fairness, accountability, and the long-term sustainability of the community. It is unacceptable for a project of this magnitude to proceed without robust provisions to protect the rights, livelihoods, and wellbeing of the local population.

The environmental risks are also significant. The proposed development threatens sensitive ecosystems, including seabird populations, marine life, and fragile habitats such as peatlands and machair. These environments are not only ecologically important but are also integral to the island's biodiversity and traditional land use. Any damage to these systems could have lasting consequences that far outweigh the perceived benefits of the project.

There are also serious concerns regarding the economic impact, particularly on tourism. The natural beauty and tranquillity of the area are key drivers of visitor interest. The introduction of a large offshore wind farm so close to the coastline risks undermining this vital sector, with potential knock-on effects for local businesses and employment.

It is also important to highlight the strength of local opposition. A community survey indicating that 88% of West Lewis residents oppose the development demonstrates a clear and overwhelming lack of social licence. Proceeding in the face of such strong community resistance would be deeply concerning and contrary to the principles of fair and inclusive planning.

In conclusion, this proposal poses unacceptable risks to the cultural, environmental, social, and economic fabric of the island. I urge the decision-makers to give full and proper weight to these concerns and to reject the 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: E0B9CC7E

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 processes. The objection arises from a review of the Environmental Impact Assessment Report and related documents. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects. The project 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 are raised regarding the proposal's scale, proximity to the shoreline, and design, as these factors challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful determination. Important environmental data is absent, baseline information is insufficient and inconsistent, and vital components of the proposal remain undefined. The use of a flexible design framework does not allow for a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures means their efficacy cannot be evaluated. Consequently, the documents fail to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are notable and significant conflicts with policy. The proposal 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. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The proposal's scale is unprecedented for this area, with large turbines sited near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental effects. Overall, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, 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 invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately

identify or assess protected species. This deficiency introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

The assessment of marine ecology and protected species is significantly flawed and fails to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies employed are insufficient, resulting in incomplete baseline data that does not reliably capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is weak.

A significant oversight pertains to otters, classified as a European Protected Species, with the application not adequately recognising their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an insufficient assessment of the potential impacts of construction disturbance, noise, and increased activity, undermining any conclusions regarding the absence of significant effects on this species.

Moreover, there are notable shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of the sharks' presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data contributes to an incomplete baseline, further diminishing the reliability of the presented conclusions.

These methodological shortcomings imply that conclusions of negligible or non-significant effects are derived from assumptions rather than sound evidence. The lack of adequate baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating ambiguity about the actual level of risk posed to marine species and habitats.

In summary, the combined issues of incomplete baseline data, inadequate methodologies, and unfounded conclusions result in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application lacks a solid evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been thoroughly integrated into the main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

TOURISM

The Isle of Lewis relies heavily on tourism, with the sector growing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the local economy. However, the application fails to assess the significant economic and social impacts that the proposed development could have on this key sector. It is acknowledged that 86% of visitors are attracted by the area's scenery, yet there is no quantitative analysis provided to understand how the introduction of large-scale

offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment does not take into account the crucial role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experiences is essential, particularly for growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on this recognised and expanding part of the local economy.

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

From a policy perspective, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the requirement to show net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, lacking 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 acknowledge the island's economic dependency leads to a significant evidential gap. This deficiency prevents 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 embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

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

constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

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

Additional Comments

I strongly object to the proposed Windfall development in Lewis due to the serious environmental and personal impact it will have on local families and the wider island community. My friend lives in the area and is deeply concerned about the effect this project will have on her family's wellbeing, mental health, and quality of life. The scale of the development threatens the peace and natural beauty that make Lewis such a special place to live.

There are also major concerns regarding the impact on marine life and the fragile local ecosystem. The waters around Lewis support important wildlife and habitats that could be harmed by increased industrial activity, pollution, and disruption to the environment. In addition, tourism is vital to the island's economy, with many visitors coming specifically for the unspoilt landscape, wildlife, and tranquillity. Industrial

development on this scale risks damaging the island's reputation and reducing tourism income for local businesses and residents.

The potential increase in pollution, noise, and environmental disturbance raises serious long-term concerns for both people and nature. I believe the wellbeing of local communities and the protection of Lewis's unique environment should be prioritised over developments that could permanently alter the character of the island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C04085D4

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime's requirements for assessing alternatives have not been met, resulting in a materially inadequate submission. The application fails to provide a structured and reasoned comparison of realistic

alternatives based on their environmental impacts. Instead, it offers a narrative of project evolution that does not establish that less harmful options were properly identified, assessed, and selected over more damaging ones.

There is no transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. The West Lewis coastline's sensitivity and the critical nature of proximity to the shore in assessing impacts highlight the necessity of this analysis. Its absence prevents any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall assessments, lacking sufficient evidence that alternative routes have been explored to mitigate impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that the application does not employ mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This shortcoming reflects a disregard for the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The lack of a thorough assessment of alternatives undermines the proposal's sustainability and policy compliance.

From a policy standpoint, these deficiencies contradict the principles laid out in National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not been sufficiently evaluated to warrant lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment provided concerning marine ecology and protected species is lacking in crucial areas and fails to offer a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically rich marine system. However, the absence of comprehensive baseline data and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active foraging and movement in coastal areas. This oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential effects of construction-related disturbances, noise, and increased activity. Such shortcomings

undermine any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, further compromising the reliability of the conclusions reached.

These methodological flaws mean that assertions of negligible or non-significant effects are primarily grounded in assumptions rather than substantiated evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the true scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty involved hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these conditions, it is unlawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and lead to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A glaring contradiction exists within the application; while the developer asserts that there are no significant adverse effects, it concurrently puts forth a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn lack sufficient backing from the

available evidence. Furthermore, the assessment does not adequately substantiate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected, failing to consider the significance of these feeding grounds fully.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment neglects to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. It adopts a simplistic approach, viewing heritage merely as a collection of isolated, static assets, rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

Key culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These active places of burial and spiritual practice are mischaracterised as static features, without consideration of their ongoing use and significance, nor the development's impact on their setting. This oversight leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted connection to the

coastal environment. These crucial elements of local identity are conspicuously absent from the evaluation, highlighting a significant deficiency. Without their inclusion, the cultural implications of the development remain poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and disregards established principles of participation in matters affecting cultural and environmental interests.

A critical procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, undermining lawful determination.

From a policy standpoint, these inadequacies directly contradict the National Planning Framework 4, particularly regarding the protection of historic assets and places. The omission of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The assessment of seascape, landscape, and visual impacts associated with the proposal is deficient and fails to adequately reflect the scale of change and the sensitivity of the environment. The introduction of large-scale turbines close to the shoreline would establish a continuous and dominant industrial presence, fundamentally transforming the character of the landscape in a permanent and irreversible manner.

The application does not sufficiently represent the extent of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities that define naturalness and remoteness. The current assessment does not accurately convey the level of impact or its significance in the context of such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, thus challenging the reliability of the

assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The treatment of these sites as isolated assets does not acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that has not been adequately examined 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 proposed is incompatible with the necessity 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 policy compliance.

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

In summary, the assessment fails to accurately represent the magnitude of 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 incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the potential environmental effects related to construction and pollution is inadequate, lacking the detail necessary for a comprehensive evaluation. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on unspecified mitigation and contingency measures to be created after consent, which hinders any meaningful assessment of their sufficiency or effectiveness.

Given the sensitivity of the receiving environment, this dependence on undefined future measures raises significant concerns. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation

and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored.

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

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate measures are in place to address pollution events. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is granted, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application proposes a development that inadequately assesses the impacts on fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not demonstrate how these vital uses and habitats will be safeguarded against significant disruption.

A critical concern is the assumption made by the application that fishing activities can be shifted without adverse effects. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can accommodate additional fishing pressures. This lack of information is crucial, as the displacement of fishing efforts could lead to overfishing in other areas, posing broader economic risks to the local fishing fleet. The absence of a clear, evidence-based evaluation means that the repercussions for fisheries and livelihoods remain unclear.

Furthermore, the proposal carries considerable risks for marine species, particularly

due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances across substantial distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises important concerns. However, the application appears to downplay the seriousness of these impacts, lacking adequate supporting evidence.

Additionally, there is a notable inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This contradiction undermines the assessment's credibility and raises questions about adherence to the Habitats Regulations, especially where anticipated harm warrants legal authorisation.

The assessment also neglects to account for cumulative impacts resulting 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 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 avert unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment of onshore infrastructure, which is materially incomplete and fails to adequately account for the interrelated impacts of the offshore turbines and onshore works. This separation obscures the true environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Importantly, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an essential carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a full understanding of the project's overall environmental footprint.

Furthermore, the approach taken prevents a proper assessment of cumulative effects, as the Environmental Impact Assessment process mandates that all aspects of a project must be evaluated collectively. The existing separation of offshore and onshore components fails to capture the combined impacts on peatlands, habitats, and local

communities, leaving significant gaps in understanding.

There are critical risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these ecosystems have been comprehensively evaluated or that adequate avoidance measures have been considered, revealing a significant evidential shortfall concerning biodiversity protection.

The proposal also introduces concerns related to carbon balance; the disruption of peatland has the potential to release stored carbon, thereby creating a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains advantageous.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, which prompts serious questions regarding the deliverability and lawful execution of the project.

From a policy standpoint, the project's incomplete assessment and failure to demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be effectively avoided or mitigated further weakens the application.

In summary, the separation of project components, the absence of a comprehensive evaluation, and the lack of substantiating evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This alteration will fundamentally change the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies that are crucial to the area's environmental quality, cultural identity, and tourism value. The Environmental Impact Assessment notably fails to address the implications of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the rising importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly concerning.

Furthermore, the proposal does not evaluate the impacts on nocturnal wildlife, which is a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic behaviour, making them susceptible to disorientation and increased collision risks. The absence of a lighting impact assessment or a phototaxis study

means that the potential effects of the aviation lighting on these species, and the risk of increased mortality, remain unexamined.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activity and the associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly at risk from disorientation caused by artificial lighting. 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 is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the failure to evaluate these factors is in conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Moreover, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment. In summary, the absence of any evaluation of dark skies and nocturnal wildlife signifies a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The assessment of the tourism impacts within the application is severely lacking and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could potentially influence visitor numbers, behaviour, or the overall economic contributions that tourism generates.

Since 2017, tourism has seen significant growth, rising from £65 million to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. Nevertheless, the application neglects to model how the industrialisation of the seascape and the associated decline in environmental quality could impact the Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment overlooks the critical relationship between environmental quality and tourism, such as the significance of unspoiled landscapes and dark skies to the visitor experience, as well as the growing markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this

shortcoming, resulting in a substantial gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

For an island community with limited economic diversification, the failure to properly assess the impacts on tourism 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 evaluated as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a substantial evidential gap. This gap obstructs a thorough evaluation of economic effects, reinforcing the conclusion that the application remains incomplete.

SUMMARY

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

Critical gaps in baseline data are apparent, alongside the use of an undefined design envelope. The reliance on unspecified mitigation measures and the omission of vital impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a full understanding of potential significant effects and residual impacts.

Procedurally, the proposal suffers from clear failures. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide the complete Social Impact Assessment represents a significant omission. Such shortcomings obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not protect biodiversity, natural places, or cultural heritage. It fails to demonstrate acceptable health and wellbeing impacts and cannot evidence a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and

onshore components have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, as well as inconsistencies within those assessments, mean that the evidential standard required to rule out adverse effects has not been achieved. This situation activates the precautionary principle, precluding a lawful conclusion about the acceptability of impacts.

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

Considering all these factors, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

Of considerable concern is the inevitable damage and impact to the unspoilt west of Lewis above and below the land and sea and the creatures living there. Irreversible damage from the Industrialisation of such a beautiful area.

The turbines need heavy oil to operate, with inevitable spillages causing pollution during operation. They cannot be recycled, so they will add to landfill at the end of their useful life.

Noise pollution: The impact of noise has not been properly considered - sound carries over long distances - unless you live in the area, this can be difficult to appreciate. This will have considerable impact on health and wellbeing.

Connection to onshore infrastructure and onwards across the island will impact the Lewis peatlands.

Dark skies to the west will be ruined, affecting sightings of the aurora and skies currently free from light pollution.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 49EDA416

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, submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural heritage. Concerns regarding the scale, proximity, and design of the proposal challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, with baseline information being limited and inconsistent. Key elements of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of the 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 thorough understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

There are evident and substantial conflicts with existing policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent, undermining the competent authority's ability to assess the development's acceptability from a policy perspective.

The unprecedented scale of the proposal introduces major concerns related to landscape capacity, visual dominance, and environmental ramifications, particularly with the large turbines located in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for this proposal raises urgent concerns regarding the Environmental Impact Assessment Report, which is notably deficient. It fails to provide a thorough, transparent, and reliable account of the potential environmental impacts. One significant issue is the use of a flexible Project Design Envelope. This approach, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. Consequently, the assessment lacks integrity, meaning the impacts presented may not accurately reflect the development as it will ultimately be constructed. This situation prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that any environmental harm is expected to be addressed later, hindering any meaningful evaluation of their effectiveness or the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to any determination.

There are significant evidential deficiencies present, including notable gaps in baseline data, limitations in the methodology employed, and a reliance on assumptions instead of site-specific evidence. As a result, there is uncertainty surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

This inadequacy leads to a failure in meeting the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. It 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 remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These serious deficiencies obstruct a lawful and thorough assessment of environmental effects and leave the competent authority ill-equipped to determine the application based on the information submitted.

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 application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leaves the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a 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 viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

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 is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive approach, treating heritage as isolated and static assets without 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 are active burial sites and places of spiritual practice, yet they are categorised in the assessment as static features. This failure to consider their continued use and meaning, along with the potential impact of development on their settings, leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language and traditions that define the community's long-standing relationship with the coastal environment. These elements are central to the area's identity but are entirely overlooked in the assessment, creating a significant omission that hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity recognised as characteristic of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These deficiencies place the proposal in direct 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 recognise living cultural practices, represents a clear departure from policy requirements.

Collectively, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing, which remain inadequately assessed and lack the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the comprehensive report has not been made publicly available. This lack of access constitutes a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own research.

Reports suggest that local residents are currently facing measurable stress, anxiety, and apprehension due to the scale and proximity of the development proposal. These negative impacts stem from direct engagement with the community and are not mere speculation. Nonetheless, the absence of the full assessment obstructs proper examination of these findings and restricts the capacity to gauge their importance in the decision-making process.

Furthermore, there is evidence indicating that the proposed development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these identified impacts have not been adequately incorporated into the main application nor afforded appropriate

consideration. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not present a comprehensive evidential foundation needed for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 concerning health and wellbeing. Developments are mandated to promote positive health outcomes and avert harm, yet the information presently available indicates existing negative effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications arising from this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material deficiency within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would lead to a continuous and dominant industrial presence, fundamentally transforming this character in a permanent and irreversible manner. The assessment fails to adequately represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The failure to convey the true extent of this impact within the context of such a sensitive landscape raises significant concerns.

Moreover, methodological issues are evident in the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately represent the most sensitive receptors or worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a risk that the actual magnitude of visual impact has been understated, which undermines the reliability of the assessment process.

Additionally, there is a critical deficiency in the assessment's treatment of 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 setting linked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these assets in isolation, disregarding their interdependence and leading to an incomplete assessment 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 represents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently examined within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the necessity to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion 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 render their presence dominant and unavoidable. Therefore, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the completeness of the assessment related to construction and pollution risks. It is evident that the application lacks essential details necessary for evaluating potential environmental effects. In a high-energy Atlantic environment, where substantial seabed preparation and installation work is planned, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on undefined mitigation and contingency measures to be established post-consent, which impedes any meaningful evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on vague future measures given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to provide adequate detail on the strategies for prevention, control, or monitoring of these risks.

The uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation further complicates the situation. Without rigorous modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats within the broader assessment context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to effectively manage pollution events. This procedural risk undermines the competent authority's ability to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the deferment of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are evaluated prior to consent, and the absence of this information renders a lawful determination impossible. Furthermore, the application fails to 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 surrounding potential impacts collectively indicate that the assessment is 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 lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry; however, the proposal does not adequately demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

One major concern lies in the assumption that fishing activities can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This absence of information is critical, as displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based evaluation, understanding the impacts on fisheries and local livelihoods becomes impossible.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disrupt marine life across large distances, impacting

species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application appears to minimise the significance of these effects, lacking sufficient supporting evidence.

Furthermore, there is a troubling inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate 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 prevent unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally deficient, failing to recognise the comprehensive impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are closely interconnected; however, their assessment is conducted in isolation. This fragmented approach obscures the overall environmental and socio-economic ramifications.

Included within the onshore works are the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of necessary access infrastructure through sensitive landscapes. These activities require excavation across areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus inhibiting a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an accurate assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project should be considered

collectively. The division of offshore and onshore components results in an incomplete understanding of the combined effects on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated, nor does it indicate that effective avoidance measures have been implemented. This results in a notable evidential gap concerning biodiversity protection.

Concerns are also raised about the project's carbon balance. Disturbances to peatland can lead to the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter and fails to confirm that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure across active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or procedures have been initiated, which raises doubts about the project's deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" across the western horizon and fundamentally changing the night-time environment. The Environmental Impact Assessment does not address the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors, which is a significant oversight given the importance of dark skies to the region and to emerging tourism sectors like astro-tourism.

Furthermore, there is a complete lack of evaluation concerning the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which

can result in disorientation and increased collision risks. The application fails to include any assessment of lighting impacts or a phototaxis study, neglecting to evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

This critical omission is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity 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 considered. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the broader evaluation of landscape and seascape impacts, as the character of night-time is a vital aspect of 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 results in an incomplete application that cannot support a lawful determination.

TOURISM

The application presents a proposal that significantly lacks a thorough assessment of tourism impacts, particularly in regard to the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While it is stated that 86% of visitors are attracted by the scenery, the application does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

In terms of economic significance, tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, with the sector supporting more than 1,000 jobs and constituting as much as 16% of the island's economy. However, the application neglects to model the potential impacts on Tourism Gross Value Added and the wider economic resilience resulting from the industrialisation of the seascape and a decline in environmental quality. Without this critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely affect an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in bolstering tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences. This is particularly relevant for burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a notable gap in understanding the effects on this recognised and growing segment of the local economy.

Within the context of an island community that experiences limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the collective deficiencies in quantifying tourism impacts, assessing the environmental drivers influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a substantial evidential gap. This lack of comprehensive evaluation significantly hampers the ability to assess the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant gap. These failures hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering

the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural areas, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and preventing a lawful conclusion that the impacts are acceptable.

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

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

Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be entirely refused.

Additional Comments

Don't do 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: 254859E1

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

Dear Sir/Madam

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under review demonstrates a fundamental inadequacy in the assessment of cultural heritage and community identity. It fails to recognise the West Lewis

coastline as a living cultural landscape, where environment, language, tradition, and community are deeply interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a reductive approach that treats heritage as isolated, static assets.

A significant shortcoming is evident in the treatment of culturally significant sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries are active burial and spiritual practice sites, yet they have been categorised as static features in the assessment. This oversight neglects their continued use and meaning, as well as the development's impact on their setting. The resulting mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the cemeteries' roles within community life.

Furthermore, the assessment neglects intangible cultural heritage aspects, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely absent from the evaluation, representing a significant omission. Without incorporating these factors, the true cultural impact of the development cannot be understood.

Concerns regarding community rights and engagement are also paramount. The Gaelic-speaking population has a unique cultural identity that aligns with characteristics of an Indigenous People, but the absence of a Free, Prior and Informed Consent process undermines the legitimacy of the assessment. This lack of meaningful engagement fails to reflect 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, a statutory requirement under the Islands (Scotland) Act 2018. This omission precludes the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the lack of recognition of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is significant and fundamentally undermines the evaluation's legality. Despite the developer commissioning a Social Impact Assessment, which included focus groups with local residents, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, obstructing both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement and are not mere speculation. However, the absence of the complete assessment hinders the scrutiny of these findings and limits the capacity to evaluate their significance in the decision-making process.

Furthermore, there is an indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" identified in the developer's own findings. Yet, these impacts have not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of clarity significantly compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly where the character and functioning of the community may be at risk. The failure to provide the complete dataset means that the application does not furnish a thorough evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not satisfactorily demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have yet to be fully disclosed. Without 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 comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This presents a risk that the extent of visual impact has been underestimated, which undermines the assessment's reliability.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is notably deficient and lacks the necessary detail to evaluate potential environmental effects adequately. The initiative necessitates significant seabed preparation and installation work in a high-energy Atlantic setting, yet it does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application is predicated on the future preparation of mitigation and contingency measures post-consent, thereby obstructing any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures is particularly troubling given the sensitivity of the environment receiving these works. The West Lewis coastline is known for its clean coastal waters and critical habitats, which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as the mobilisation of sediments and the possibility of accidental chemical or oil spills, it fails to offer sufficient details on the strategies for preventing, controlling, or monitoring these risks.

Moreover, there exists uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to the potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring the development of contingency plans until after consent has been granted, the application hinders an evaluation of whether adequate safeguards are in place to manage pollution incidents. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is required that likely significant effects and mitigation strategies be evaluated prior to granting consent. The absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of comprehensive management plans, and the uncertainty regarding potential impacts render the

assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

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 assessment of tourism impacts is inadequate, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. The local tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantitative analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the economic contributions of tourism.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential effects of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the broader economic resilience. In the absence of such an analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

The analysis also overlooks the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences and emerging sectors like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, resulting in a substantial gap in understanding the implications for a recognised and growing part of the local economy.

For an island community with limited economic diversification, the neglect to assess the impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined as mandated by the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, failure to assess the environmental factors driving visitor behaviour, and disregard for the island's economic dependencies culminate in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal 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.

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: AE3A5118

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regulations. The objection arises from an analysis of the Environmental Impact Assessment Report and accompanying documentation, highlighting several significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural issues. Situated off the west coast of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles, particularly given its scale, proximity to the shore, and design.

The application lacks a solid evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many key aspects of the proposal are left undefined. The application's flexible design framework inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed view of the potential environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and substantial. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly impact the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable under policy terms.

The unprecedented scale of this proposal raises additional issues, as large turbines are planned to be positioned in close proximity to the shoreline, introducing serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to accurately convey the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent assessment based on worst-case scenarios, undermining the integrity of the evaluation. Consequently, the presented impacts may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be managed later obstructs any meaningful assessment of the effectiveness of these measures or the evaluation of residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to any determination.

Furthermore, there are notable gaps in the evidence provided, including insufficient baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of both cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly evaluated or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is a significant concern, as it does not fulfil the statutory requirements set by the Environmental Impact Assessment regime.

The application provides a narrative account of the project's development rather than a structured, reasoned comparison of viable alternatives based on their environmental impacts. This failure raises questions about whether less harmful options have been adequately identified, assessed, and prioritised over more damaging solutions.

Moreover, the lack of a transparent, evidence-based comparison extends to the assessment of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where there would likely be reduced visual, ecological, and coastal impacts. The sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in determining impacts further highlight the absence of this analysis, preventing any conclusion that the proposed siting is the least damaging option available.

Concerns about deficiencies also relate to cable routing and landfall assessment. There is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the concept of mitigation by design has not been considered, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to determine whether more suitable, less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission, contributing to the overall assessment that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species in the application is insufficient, leading to an incomplete understanding of ecological receptors in the West Lewis coastal area. This marine environment is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methods employed do not sufficiently identify species presence, behaviour, or habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for determining potential impacts.

One critical area of concern is the failure to adequately assess otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their active use of coastal regions for foraging and movement. This oversight neglects their core foraging range and behavioural characteristics, leading to an inadequate evaluation of the impacts arising from construction disturbances, noise, and heightened activity. Such omissions undermine any assertions about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys that may introduce significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate their frequent usage of these waters. By failing to integrate or adequately consider this data, the assessment presents an incomplete baseline that diminishes the validity of its conclusions.

These methodological shortcomings result in the assessment's conclusions of negligible or non-significant effects being based more on assumptions than on substantiated evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty casts doubt on the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes a definitive conclusion regarding the absence of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the granting of consent would not be legally justified.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and conclusions that lack support renders the assessment unreliable. These inadequacies hinder a comprehensive evaluation of impacts on marine ecology and protected species, affirming that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking adequate evidence and containing significant internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not provide the necessary evidential assurance that these species will remain unaffected. The development is situated within crucial foraging areas and migratory routes, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly assessed.

A critical inconsistency arises within the application, where the developer asserts that 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. This contradiction undermines the credibility of the assessment and suggests that the conclusions reached are not adequately supported by the available evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding areas is not fully acknowledged, and reliance on modelling approaches introduces uncertainties, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the limitations of baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk by effectively creating a barrier in 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 ongoing mortality within this corridor, nor does it consider the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful determination in favour of consent. The identified deficiencies also signify a non-compliance 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 negatively impacted places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These flaws impede a thorough evaluation of potential impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity fails to recognise the West Lewis coastline as a living cultural landscape. This landscape is shaped by the connections between the environment, language, tradition, and community. The application reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites serve as active places for burial and spiritual practice. However, they are characterised as static features, which overlooks their

continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of the cultural effects and ignores their importance in community life.

The assessment also overlooks intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring 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. Without considering these elements, the cultural impact of the proposed development cannot be accurately understood.

There are also concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has been undertaken. The lack of meaningful engagement undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to evaluate the social, cultural, and economic impacts on the island community. Without it, the determination of the application cannot be deemed lawful.

From a policy perspective, the deficiencies in the assessment conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with living cultural practices, deviates from policy requirements.

The collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This lack of transparency creates a significant evidential gap that hinders the public and the competent authority from grasping the full extent of social risks revealed 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 are based on direct engagement and are therefore not speculative. Yet, the withholding of the complete assessment restricts proper scrutiny of the findings and limits the ability to evaluate their significance within the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with evidence of "cultural loss" identified in the developer's findings. Despite this, these impacts have not been adequately incorporated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment thus obscures the true human and social cost of the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functionality are at stake. By not providing the complete dataset, the application does not present a comprehensive evidential basis for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development is required to promote positive health outcomes and avoid harm, yet the evidence available suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications are noteworthy. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and constitutes a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual

viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims 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 both dominant and unavoidable. Thus, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings inhibit a trustworthy evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment surrounding construction and pollution risks remains insufficient, lacking the necessary detail to accurately gauge potential environmental effects. This proposal entails significant seabed preparation and installation activities within a high-energy Atlantic setting. However, it fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be developed after consent, which inhibits any meaningful assessment of their effectiveness or adequacy.

Particularly alarming is the reliance on undefined future measures, given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters

and vital habitats that are susceptible to contamination and sediment disturbance. While the application notes risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not provide adequate detail on preventative, controlling, or monitoring measures.

Moreover, there exists a level of uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential repercussions on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are established to manage pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to evaluate environmental protection measures prior to the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards stands in conflict with the requirements set by the Environmental Impact Assessment regime. Significant effects and corresponding mitigations must be appraised before consent is granted, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy stipulations concerning environmental protection and water quality.

When considering the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts, it becomes clear that the assessment is materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and collectively support the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The 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 fails to provide a thorough evaluation of the onshore infrastructure, which is critical as it forms part of a singular integrated project alongside the offshore turbines. By assessing these components separately, the proposal adopts a fragmented approach, obscuring the true extent of the environmental and socio-economic repercussions. This is particularly concerning given the onshore elements, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through delicate landscapes. These activities involve excavation through deep peat areas, especially within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. As a result, the application does not deliver a complete assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts prevents a proper evaluation of

cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and local communities remain largely unexamined. Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these vital habitats have been fully assessed or that appropriate measures to avoid harm have been implemented, creating a significant gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, potentially leading to a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not adequately tackle this concern or provide assurance that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with current land use and legal rights. The lack of evidence confirming that the required consents or processes have been initiated casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and demonstrate adequate protections for peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Ultimately, the separation of the project components, the absence of a comprehensive assessment, and the lack of evidential support regarding environmental and land use impacts culminate in an incomplete and unreliable submission, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, the proposal neglects to evaluate its effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are

particularly vulnerable to artificial lighting due to phototaxis, leading to potential disorientation and heightened risks of collision. The absence of a lighting impact assessment or a phototaxis study means the proposal does not properly consider how aviation lighting could adversely affect these species or contribute to increased mortality rates.

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

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

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

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

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has expanded 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. Despite this importance, the application in question fails to adequately assess the potential economic and social impacts on this vital sector. While it is noted that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Moreover, the assessment overlooks the critical relationship between environmental quality and tourism. The unspoiled landscapes, dark skies, and sense of remoteness are essential to the visitor experience, particularly for burgeoning sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortfall, leaving a significant void in understanding the implications for an increasingly recognised component of the local economy.

In addition, the absence of a comprehensive Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been thoroughly evaluated, contrary to the requirements set out in the Islands (Scotland) Act 2018. In a community with limited economic diversification, this oversight poses broader risks to employment, local businesses, and community sustainability. Furthermore, from a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4, especially regarding the necessity for a net economic benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Ultimately, the shortcomings in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap. This gap hinders a thorough assessment of economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

The application lacks a complete and reliable evidential basis for determination. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Mitigation measures are not specified, and key impact pathways such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have been omitted. Consequently, the Environmental Impact Assessment is incomplete and does not provide a clear understanding of the likely significant effects or residual impacts.

There are also evident procedural failures in the application process. The absence of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal conflicts directly with the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It fails to confirm that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit, particularly due to the lack of

tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been appropriately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I do not believe this proposal reflects a just or equitable approach to energy transition. On the basis of material planning considerations, I object to the the scale, location and negative environmental impact. I have concerns about infrastructure capacity as well as negative community and amenity impact. Our people, our marine life and our environment, are our most important assets and this proposal threatens to harm both in ways that are detrimental and harmful for many years to come. The cumulative impact of this development risks violating human rights of islanders under Article 1 of the Protocol No. 1 and Article 8. This development bypasses cumulative impact assessments and threatens environmental integrity, protected marine wildlife, and local infrastructure. I have concerns it will accelerate depopulation in the Western Isles due to the nature of the industrial-scale development.

My objection is based on concerns regarding the scale, location and likely impact of this development on the marine and coastal environment off the west coast of Lewis. This area is an important seascape with significant environmental, cultural and community value. An industrial development of this scale, positioned relatively close to shore, would permanently alter the character of the west coast and surrounding marine environment.

I am particularly concerned about:

The visual and cumulative impact of large-scale offshore industrialisation around the Outer Hebrides.

Potential impacts on marine wildlife, including seabirds and marine mammals.

Impacts on fisheries and traditional marine use.

The cumulative effect of associated infrastructure, including export cables and onshore transmission works.

The lack of certainty regarding long-term environmental consequences in such a sensitive coastal and marine area.

The west coast of Lewis remains one of the most distinctive and unspoilt coastal environments in Scotland, and developments of this scale should be approached with extreme caution.

I do not believe the environmental and community impacts have been sufficiently justified.

Community benefit funds, scholarships or sponsorships do not remove the need to assess whether the development itself is appropriate.

For these reasons, I object to the proposal and ask that full weight is given to landscape, seascape, cultural heritage, community wellbeing, wildlife, peatland, fisheries, cumulative infrastructure and long-term local impact.

I ask that the Marine Directorate gives full consideration to the cumulative effects of offshore wind development in the Outer Hebrides before consenting to this proposal.

For these reasons, I object to the Spiorad na Mara offshore wind farm proposal.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2125BF14

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. 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 arise regarding the scale, proximity, and design of the proposal, which fundamentally question its compatibility with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application lacks an adequate evidential basis for a lawful determination, with essential environmental data absent, baseline information limited and inconsistent, and key aspects of the proposal left undefined. The reliance on a flexible design framework hinders a clear understanding of likely significant effects, and without specified mitigation measures, their effectiveness remains unassessed. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, the proposal exhibits clear and substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests needed for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and does not deliver a full or transparent overview of the potential environmental impacts of the proposal. The introduction of a flexible Project Design Envelope, which lacks firm

commitments to specific dimensions or configurations of turbines, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and obscures the true environmental effects, preventing both the public and the competent authority from fully grasping the implications of the development.

Moreover, the application is heavily reliant on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. Seeking consent under the assumption that potential environmental damage will be managed later is unacceptable and hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. The deferral of critical information to stages following consent contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before any decision is made.

There exist substantial evidential gaps, including insufficient baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible effects are drawn without adequate supporting data. The lack of sufficient information prevents a comprehensive understanding of cumulative impacts and introduces scientific uncertainty that fails to align with statutory requirements.

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

In summary, the combination of an undefined design envelope, lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. The ornithological assessment associated with the proposed development contains 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. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application. The developer concludes that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented lack adequate support from the underlying evidence. Furthermore, the assessment does not provide sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is incomplete and the behavioural responses of species are not well understood.

The placement of turbines within a recognised migratory corridor presents an additional risk, creating a barrier within 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 the potential impacts on species with relatively small global populations.

From a regulatory perspective, the application does not meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Additionally, 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 internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape, where environment, language, tradition, and community are intricately linked. However, the assessment of cultural heritage and community identity in the application is inadequate, adopting a simplistic view that treats heritage as isolated and static, rather than acknowledging its ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active burial sites, vital for spiritual

practices, are inaccurately categorised as static features, neglecting their continued use and the potential impacts of development on their settings. This oversight leads to an incomplete evaluation of cultural effects, disregarding their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language and local traditions, alongside the community's long-standing connection to the coastal environment. These elements are central 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 engagement. The Gaelic-speaking population represents a distinct cultural identity, akin to that of an Indigenous People; yet, the absence of a process for Free, Prior and Informed Consent undermines the credibility of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone is sufficient to prevent a lawful determination.

From a policy standpoint, these deficiencies conflict directly with National Planning Framework 4, especially regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, represents a clear departure from policy standards.

Overall, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sound basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This situation creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted in the developer's own research.

Summaries available suggest that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These

impacts arise from direct engagement and are not merely speculative. Nevertheless, the absence of the complete assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Yet, these impacts have not been adequately incorporated into the main application or given the appropriate consideration they warrant. The failure to disclose the full Social Impact Assessment thus conceals the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning are at stake. By withholding the full dataset, the application does not provide a comprehensive evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must promote positive health outcomes and avoid harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This constitutes a material omission within the application and indicates a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to release the full Social Impact Assessment, coupled with evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and strengthens the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly inadequate, failing to accurately portray the degree of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The addition of large-scale turbines in close proximity to the shore would create a persistent industrial presence, fundamentally changing this character and leading to an irreversible transformation of the landscape.

Moreover, the application does not sufficiently depict the extent of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The

assessment does not accurately reflect the significance of this impact within the context of such a sensitive landscape.

Concerns are also present regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact is understated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets without acknowledging their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not just a visual impact, but also a wider cultural and spatial damage that has not been properly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change is incompatible with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further 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 inescapable. Consequently, the change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. A key concern is the assumption made in the application that fishing activities can be displaced without any consequences. There is no evidence presented to support the availability or accessibility of alternative fishing grounds that

can withstand additional pressure. This significant omission raises the risk of overfishing in other areas, which may have broader economic repercussions for the local fishing fleet. Consequently, without a clear, evidence-based assessment, the implications for fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during the construction phase. The prolonged high-energy hammer piling is likely to cause disturbances over considerable distances, impacting species such as dolphins. Concerns arise from the predicted disturbance to a considerable portion of the local bottlenose dolphin population, yet the application tends to downplay these effects, lacking sufficient supporting evidence.

Additionally, there is an inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders any determination of the overall impact on marine ecosystems and socio-economic conditions.

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of industrialisation on the seascape or the resulting loss of environmental quality. Without this analysis, it is impossible to ascertain whether the proposed development would

yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears broader implications 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, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a profound inadequacy in meeting the standards of sustainable development, as established by statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. However, this application is now under a more rigorous policy framework, which places greater emphasis on biodiversity, peatland preservation, landscape integrity, and the well-being of communities.

A complete and trustworthy evidential foundation for determining this application is lacking. There are significant gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Moreover, crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hampers a thorough understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The absence of a compliant Island

Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a notable omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community well-being, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct opposition to the National Planning Framework 4. It fails to illustrate the protection of biodiversity, natural landscapes, and cultural heritage, does not demonstrate that health and well-being impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

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

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, the disruption of cultural and visual relationships, and impacts on tourism are all permanent consequences that cannot be mitigated to an acceptable degree.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to utilise the appropriate regulatory provisions to request 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

This windfarm is hugely impactful on the area and should not be built. The impacts to people, the landscape, animals, birds and marine life will be significant. This side of the island is also a hot-spot for tourists and will drive people away. Those that live in the area will be impacted by the sight of such huge structures, and their noise etc. My family moved here for its outstanding beauty, this development turns the area into an ugly marine industrial estate which is criminal.

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: C72C60CB

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 accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis to support a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and several key aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework obstructs a clear understanding of the likely significant effects of the development. The reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the potential environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with 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 does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests required for consent and compromise the competent authority's ability to conclude that the development is acceptable within a policy context.

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, resulting in an inadequate and opaque account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders the ability to consistently apply a worst-case scenario and diminishes the reliability of the assessment. Consequently, the impacts outlined may not accurately represent the actual development, leaving both the public and the competent authority unable to fully comprehend the true extent of environmental effects.

Additionally, the application's heavy reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans leads to consent being sought on the premise that environmental harm will be addressed after approval. This deferral of essential information to post-consent stages is unacceptable from a procedural standpoint and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Moreover, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies introduce uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and data gaps renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies inhibit a lawful and thorough evaluation of environmental effects, preventing the competent authority from making an informed decision based on the available information.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a structured evaluation of realistic alternatives based on their environmental effects, it provides a narrative account of project evolution. This method does not show that less harmful options have been identified, assessed, and selected over more damaging ones.

Furthermore, there is no clear or evidence-based comparison of different offshore locations, development scales, or design configurations. The developer has not convincingly considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts might be lessened. Given the sensitivity of the West Lewis coastline, the importance of proximity to shore in determining impact cannot be overstated. The lack of analysis in this regard means that it cannot be concluded that the proposed location is the least damaging.

These deficiencies are also present in the assessment of cable routing and landfall. There is insufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive areas, including cultural and spiritual sites such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis indicates a failure to implement mitigation by design, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This shortcoming reflects a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to determine whether there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it is not possible to assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, leading to the conclusion that the application has not undergone proper evaluation and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight in the application pertains to otters, which are a European Protected Species. The failure to properly recognise and assess their active use of coastal areas for foraging and movement is troubling. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity have not been adequately evaluated. This lack of assessment undermines any conclusions regarding the absence of significant effects on otters.

Further shortcomings are evident in the assessment of basking sharks, where reliance on aerial surveys has led to significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such important data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The inadequacy of baseline data also hinders meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual scale of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided. Insufficient evidence is presented regarding the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in

severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application fails to recognise this connection, approaching cultural heritage and community identity in a fundamentally inadequate manner. Rather than viewing heritage as dynamic and ongoing, it treats it as a collection of isolated and static assets, neglecting their social, cultural, and spiritual significance within the community.

This shortcoming is particularly evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places of burial and spiritual practice, yet the assessment mischaracterises them as static features. It does not take into account their continued use, meaning, or the impact that development may have on their setting, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Additionally, the assessment omits consideration of intangible cultural heritage, such as the Gaelic language and traditions, as well as the community's enduring relationship with the coastal environment. These aspects are vital to the identity of the area but are entirely absent from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples, 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 adhere to established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is mandated by the Islands (Scotland) Act 2018, and without it, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination of the application.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear departure from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, leaving the true cultural cost of the proposal unaddressed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This significant evidential gap obstructs both the public and the competent authority from grasping the complete extent of social risks identified in the developer's own research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement rather than speculation, but the failure to disclose the full assessment hampers proper scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings acknowledging "cultural loss." Despite this recognition, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. By not providing the complete dataset, the

application fails to offer a comprehensive evidential basis for evaluating the balance between benefits and harm.

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

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual effects reveals significant deficiencies that do not properly reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and undeveloped nature, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would introduce a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape.

The application underestimates the magnitude of the visual change expected. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the qualities of naturalness and remoteness that define the area. The assessment fails to adequately communicate this level of impact and its significance within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially in relation to crucial cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Moreover, the application neglects to assess the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The

assessment treats these sites as isolated, failing to acknowledge their interdependence, which leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This creates not just a visual impact but also broader cultural and spatial harm that the application does not adequately address.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be rendered acceptable through mitigation efforts.

Overall, 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 safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, leaving it insufficient for determining the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it suggests that mitigation and contingency measures will be established after consent is granted, obstructing any meaningful evaluation of their potential adequacy or effectiveness.

This uncertainty regarding future measures is particularly troubling, considering the sensitivity of the environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and pollution. Although the application notes risks such as sediment mobilization and the possibility of chemical or oil spills, it lacks sufficient detail on methods to prevent, control, or monitor these occurrences.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also

encompasses potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards will be in place to address pollution incidents. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and clarity on potential impacts contributes to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding its evaluation of marine life and fisheries, revealing a lack of robust assessment of both ecological and socio-economic impacts. The waters off the West Lewis coast host a vibrant marine ecosystem alongside an active fishing industry, yet there is no evidence provided to assure that these critical habitats and activities can be protected from substantial disruption.

A notable flaw is the assumption that fishing activities can be displaced without repercussions. The application fails to demonstrate the availability or accessibility of alternative fishing grounds that could handle any additional pressures resulting from displacement. This lack of evidence is critical as it opens the door to potential overfishing in other areas, posing economic risks for the local fishing fleet. The impacts on livelihoods and fisheries remain inadequately understood due to the absence of a clear, evidence-based evaluation.

Moreover, the proposal presents considerable risks to marine species, particularly from construction-related underwater noise. The anticipated high-energy hammer piling over a prolonged duration is likely to create disturbances that reach significant distances, adversely affecting species such as dolphins. The expected impact on a substantial portion of the local bottlenose dolphin population raises serious concerns; yet, the application minimises the significance of these effects, lacking adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it

acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes those impacts as negligible. This contradiction raises alarming questions about compliance with the Habitats Regulations, especially where anticipated harm could necessitate legal authorisation.

The assessment inadequately considers cumulative impacts that arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns about carbon balance. The disturbance of peatland can lead to the release of stored carbon, resulting in a carbon debt that is contrary to the goals of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance will remain positive.

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

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This reveals a significant evidential gap in terms of biodiversity protection.

The assessment of onshore infrastructure is materially incomplete and does not account for the full range of impacts associated with what is fundamentally a single integrated project. The onshore works and offshore turbines are intrinsically linked yet assessed separately, leading to a fragmented approach that conceals the true scale of environmental and socio-economic effects.

The onshore elements include cabling across protected moorland, the construction of

a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be assessed collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain inadequately understood.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this vulnerability has also gone unassessed.

The absence of site-specific night-time data creates a critical void in understanding the ecological impacts of the proposal.

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

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

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

TOURISM

The evaluation of tourism impacts associated with the proposed development is severely inadequate, failing to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism sector is intrinsically linked to the area's wild coastline, nearly untouched landscapes, dark skies, and an overarching sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantifiable analysis of how the introduction of large-scale offshore infrastructure could influence visitor numbers, their behaviour, or the overall economic contributions of this sector.

Tourism has experienced substantial growth, with its contribution rising from £65 million in 2017 to over £81.5 million, thus supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. This lack of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an already flourishing sector.

Additionally, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly regarding the value of unspoiled landscapes and dark skies to visitor satisfaction, as well as to emergent markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortfall, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the oversight in assessing tourism impacts bears broader consequences for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment has resulted in the failure to evaluate these economic vulnerabilities as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, specifically regarding 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 implications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and considering the island's economic dependencies culminate in a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the determination that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application revisits the central concerns that resulted in the denial of the Lewis Wind Power proposal in 2008, which was deemed excessively industrialised. Presenting the application now under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not adequately address these issues.

Critical deficiencies exist in the evidential basis for the proposal. The baseline data is incomplete, there is continued reliance on an unspecified design envelope, mitigation measures are vague, and essential impact pathways, including effects on nocturnal wildlife, the full extent of onshore infrastructure, and tourism impacts, have not been thoroughly examined. Consequently, the Environmental Impact Assessment is deficient, failing to provide a comprehensive understanding of the significant effects or residual impacts that may arise.

The application also exhibits notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a clear violation of statutory duties 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 the impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Furthermore, the proposal is at odds with the National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural environments, and cultural heritage. There is a failure to show that health and wellbeing impacts are

acceptable, and the absence of tourism impact modelling precludes any evidence of net economic benefit. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially serious. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally contradictory. The evidential burden necessary to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, this proposal would induce significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the effects on tourism constitute permanent impacts that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct the ability to make a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the necessary 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

I live on the Isle of Lewis and will be directly affected by the proposed wind farm development on the west side of the island. The turbines will be visible from my home and will permanently change the landscape that I and many others value deeply.

I am extremely concerned about the cumulative impact this development could have on the health and wellbeing of local residents. The scale and proximity of the turbines raise concerns about noise pollution, shadow flicker, sleep disturbance, stress, and the overall effect on quality of life for people living nearby. Even where the long-term health impacts are disputed, I do not believe local communities should be expected to accept these risks without certainty.

I am also deeply worried about the impact on wildlife and the natural environment. The west side of Lewis is known for its unique beauty, open landscapes, peatlands, birdlife, and fragile ecosystems. Industrial-scale turbines, access roads, excavation, and associated infrastructure risk causing lasting environmental damage and disturbing habitats that are important both locally and nationally.

The visual impact of such a large development will fundamentally alter the character of

the area. Many people live here, or visit Lewis, because of its unspoilt scenery, sense of space, tranquillity, and connection to nature. I believe this proposal threatens those qualities and could negatively affect tourism and the wider reputation of the island.

I feel that developments of this scale should not proceed where they risk harming communities, landscapes, and wildlife that cannot easily be restored once damaged.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B392B266

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documentation, highlighting various deficiencies related to planning, environmental matters, cultural aspects, and procedural elements. 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 rich cultural identity. There are profound concerns regarding the scale, proximity, and design of the proposal, particularly in terms of its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the impacts on environmental, cultural, or community aspects, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are significant and clear policy conflicts at play. The proposal does not align 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 that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts are directly linked to the statutory tests necessary for consent and severely undermine the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns due to the large turbines being positioned in close proximity to the shoreline, leading to worries about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrates that the application is incomplete and incapable of receiving a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is 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 Environmental Impact Assessment regime's requirements for assessing alternatives have not been met, resulting in a materially inadequate submission. The application fails to provide a structured and reasoned comparison of realistic alternatives based on their environmental impacts. Instead, it offers a narrative of project evolution that does not establish that less harmful options were properly

identified, assessed, and selected over more damaging ones.

There is no transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. The West Lewis coastline's sensitivity and the critical nature of proximity to the shore in assessing impacts highlight the necessity of this analysis. Its absence prevents any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall assessments, lacking sufficient evidence that alternative routes have been explored to mitigate impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy, coupled with the absence of comparative analysis, indicates that the application does not employ mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This shortcoming reflects a disregard for the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The lack of a thorough assessment of alternatives undermines the proposal's sustainability and policy compliance.

From a policy standpoint, these deficiencies contradict the principles laid out in National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not been sufficiently evaluated to warrant lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application presents significant deficiencies that undermine its reliability and completeness. This coastal environment in West Lewis is recognised as a highly sensitive and biologically active marine system. However, the methodologies employed do not adequately capture essential data regarding species presence, behaviour, and habitat use, resulting in a weak evidential basis for evaluating potential impacts.

Of particular concern is the treatment of otters, a European Protected Species, where the application fails to fully recognise their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and increased human activity have not been sufficiently evaluated. Consequently, this lack of consideration undermines any conclusions drawn about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduces considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate a frequent use of these waters. The failure to include or adequately consider this data leads to an incomplete baseline, further diminishing the reliability of the conclusions offered.

These methodological weaknesses result in assessments of negligible or non-significant effects that are based more on assumptions than on solid evidence. The absence of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates a significant level of uncertainty regarding the actual risks posed to marine species and their 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 uncertainties introduced prevent a clear exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns regarding the reliability of its ornithological assessment, which is marked by notable gaps in evidence and inconsistencies. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will not be adversely affected by the proposed development. The turbines are positioned within critical foraging areas and migratory routes, yet the assessment fails to sufficiently evaluate the risks associated with displacement, collision, and habitat loss.

A critical inconsistency exists in the application, as the developer asserts that there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack the necessary evidential support. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The

methodologies used may underestimate potential mortality rates, especially in light of incomplete baseline data and an insufficient understanding of species behaviour.

The placement of turbines within a recognized migratory corridor presents additional significant risks, effectively forming a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate 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 fulfil the evidential standard needed to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

Moreover, the identified deficiencies signify a failure to adhere to the 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 remain unaffected puts the proposal at odds with national policy.

In summary, the assessment is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally inadequate. It does not recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The application adopts a reductive approach, viewing heritage merely 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 locations are active places of burial and spiritual practice; however, they are categorised as static features in the assessment. This failure to consider their continued use and meaning, as well as the implications of development on their settings, results in an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Moreover, the application neglects to assess intangible cultural heritage, including the Gaelic language and local traditions. The long-standing relationship between the community and the coastal environment is central to the area's identity, yet these elements are entirely absent from the assessment, representing a significant omission. As such, the cultural impact of the development cannot be fully understood without

considering these crucial factors.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, which aligns with characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to adhere to 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, as required under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination of the proposal.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy requirements.

In summary, the collective failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical failure that compromises the integrity of the application. The competent authority cannot conduct a thorough socio-economic and health evaluation without this essential information, resulting in a material omission that undermines the evidential requirements set by the Environmental Impact Assessment regime.

Available summaries suggest that residents are already facing significant stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with local residents and are not mere speculation. However, the lack of access to the full assessment hinders appropriate scrutiny of these findings, thereby limiting the ability to assess their significance in the decision-making process.

Additionally, evidence indicates that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own research. Despite this, such impacts have not been adequately incorporated into the main application or considered with the seriousness they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This transparency issue also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functionality. The application does not provide a complete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application falls short of demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development should facilitate positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

In summary, the deficiencies stemming from the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, culminate in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts on the seascape, landscape, and environment is inadequate. It does not properly reflect the sensitivity of the surroundings or the scale of change that would occur. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The proposal does not accurately depict the extent of visual change that would take place. The size and location of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would negatively affect visual amenity and diminish the qualities that define naturalness and remoteness. The assessment fails to communicate the significance of this impact within the context of such a sensitive landscape.

Concerns exist regarding the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This possibility raises doubts about the accuracy of the assessed visual impacts, suggesting they may be understated.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape with visual and spatial relationships to the Atlantic horizon. Instead of recognizing their interdependence, the assessment treats these sites in isolation, leading to an incomplete evaluation of their

impacts and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are experienced and disconnecting them from the natural horizon. This issue represents not just a visual impact but also a more profound cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal contradicts the National Planning Framework 4, which aims to protect natural places and historic assets. The anticipated changes do not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further calls into question compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting changes are fundamental and permanent and cannot be sufficiently reduced to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately reflect the impact scale, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans raises significant concerns regarding the proposal's adherence to environmental protection standards. The project entails extensive seabed preparation and installation in a challenging high-energy Atlantic environment, yet relies on unspecified mitigation and contingency measures that are to be developed after consent. This approach fundamentally undermines any meaningful evaluation of the potential adequacy and effectiveness of these measures.

Particularly troubling is the sensitivity of the receiving environment, which includes the West Lewis coastline characterised by clean coastal waters and important habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, managed, or monitored effectively.

Moreover, there exists a notable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of such impacts. This uncertainty further extends to the possible effects on marine species and habitats that are already recognised as sensitive in the broader assessment context.

The situation is exacerbated by the lack of detailed emergency response procedures. Deferring contingency planning until post-consent prevents a thorough evaluation of whether adequate safeguards are in place to manage pollution incidents effectively. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards is inconsistent with the mandates of the Environmental Impact Assessment framework. It is imperative that significant effects and mitigation strategies are evaluated prior to granting consent; without such information, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Collectively, the failure to articulate defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to provide a 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 fails to adequately assess the onshore infrastructure, presenting a materially incomplete evaluation that does not capture the full extent of the impacts stemming from what is essentially a single integrated project. While the offshore turbines and onshore works are intrinsically connected, their assessment occurs separately, leading to a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which represents a significant carbon store and ecologically sensitive habitat. Due to the lack of a comprehensive assessment of these impacts, there is no complete understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments further hinders proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all components of a project must be evaluated collectively, yet the disjointed approach to offshore and onshore elements prevents a full grasp of the combined impacts on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application

fails to show that the effects on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, highlighting a significant evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or provide evidence that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The lack of evidence that the necessary consents or processes have been initiated casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety and demonstrate the protection of peatlands, habitats, and land use interests conflicts with both the National Marine Plan and National Planning Framework 4. The inability to 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 render this segment of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon and fundamentally altering the night-time environment. The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing significance of dark skies to the local identity and emerging tourism sectors, such as astro-tourism.

Moreover, there is a critical absence of evaluation regarding 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 risk of collision. The lack of a lighting impact assessment or phototaxis study means that there is no understanding of how the proposed aviation lighting could affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. For example, species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated.

The absence of site-specific night-time data creates a critical gap in comprehending ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission conflicts with the National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. This oversight further undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is fundamentally flawed, lacking a comprehensive analysis of the economic and social ramifications for a vital segment of the Isle of Lewis's economy. Tourism thrives on the region's wild coastline, its largely untouched landscapes, dark skies, and an overarching sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application fails to provide any quantifiable assessment regarding how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions of tourism.

The growth of tourism has been remarkable, escalating 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 proposal does not simulate how the potential industrialisation of the seascape and the degradation of environmental quality might affect Tourism Gross Value Added or the broader economic resilience. The lack of such crucial analysis renders it impossible to ascertain whether the development would produce a net economic benefit or threaten an established and expanding sector.

Furthermore, the assessment neglects to acknowledge the significance of environmental quality in fostering tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and in burgeoning markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a vital and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the oversight

in assessing tourism impacts carries broader consequences for employment, local enterprises, and community sustainability. The absence of a proper Island Communities Impact Assessment signifies that these economic vulnerabilities have not been scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and falls short of supplying sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, these deficiencies in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and recognising the island's economic dependence culminate in a substantial evidential gap. This gap obstructs a thorough assessment of the economic effects and supports the conclusion that the application is inadequate.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards required for sustainable development when evaluated against statutory duties, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, when the unacceptable scale of industrialisation was highlighted. Despite being presented within a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the fundamental shortcomings remain.

There is a distinct lack of a complete and reliable evidential foundation for the application. Notable gaps in baseline data, the use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects undermine the Environmental Impact Assessment. Consequently, this assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts.

The application also exhibits clear procedural deficiencies. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a substantial omission. These shortcomings impede the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage. Additionally, it fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative

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

Environmental risks associated with this proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, alongside policy inconsistencies 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 invoke 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 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: 92FC1784

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 accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis to support a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and several key aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework obstructs a clear understanding of the likely significant effects of the development. The reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the potential environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with 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 does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests required for consent and compromise the competent authority's ability to conclude that the development is acceptable within a policy context.

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to adequately assess alternatives in accordance with the Environmental Impact Assessment requirements. It does not offer a structured comparison of realistic alternatives based on their environmental effects. Instead, it provides a narrative of project development that does not show that less harmful options have been properly identified or considered in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, scales of development, or design configurations. Specifically, the application does not indicate that the developer has seriously evaluated the possibility of placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that this lack of analysis precludes any conclusion that the proposed site is the least damaging option.

The shortcomings also apply to cable routing and landfall assessments, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, such as Barvas Cemetery, which holds cultural and spiritual significance. The absence of a clear avoidance strategy, alongside the lack of comparative analysis, suggests that mitigation by design has not been adequately considered, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to assess whether less harmful and more suitable alternatives are available. A thorough alternatives assessment is essential; without it, the sustainability and policy compliance of the proposal cannot be confirmed.

From a policy standpoint, this inadequacy compromises alignment with National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community well-being. The absence of a systematic and comparative assessment represents a significant omission that supports the conclusion that the application has not been sufficiently evaluated and is unable to warrant a lawful determination.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, with substantial gaps in evidence and inconsistencies that compromise its conclusions. This region of the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the assessment falls short in evaluating the implications of potential displacement,

collision risks, or habitat loss.

Moreover, there is a fundamental contradiction in the application, where the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence available.

The evidence provided does not sufficiently show that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unharmed. The importance of these feeding grounds is inadequately acknowledged, and reliance on modelling techniques introduces further uncertainty, especially for severely declining species such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor presents a significant risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to properly assess the long-term consequences of sustained mortality in this corridor or consider 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, along with gaps in data and limitations in modelling, indicates that the requisite standard of being beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which hinders a lawful conclusion that could support consent.

In addition, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

All these factors combined render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements needed for a valid determination.

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 nature, and strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is significantly lacking, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately portray the magnitude of the visual impact. The scale and proximity of the turbines would dominate views from residential areas,

historic sites, and popular coastal locations, thereby affecting visual amenity and diminishing the qualities that define naturalness and remoteness. Furthermore, the assessment does not convey the true level of impact or its significance within such a sensitive landscape.

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

Additionally, the application fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these assets in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of change proposed is incompatible with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life is insufficient and does not adequately evaluate ecological or socio-economic impacts. The application does not demonstrate that the existing habitats and uses can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or able to support increased pressure. This is a significant omission, as displacement could lead to overfishing in other areas and may have wider economic implications for the local fishing fleet. The impacts on fisheries and livelihoods cannot be fully understood without a clear, evidence-based assessment.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling over an extended period is likely to disturb marine life across large distances, affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Despite this, the application downplays the significance of these effects without sufficient supporting evidence.

There is also a clear inconsistency in the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment overlooks cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of

industrialisation on the seascape or the resulting loss of environmental quality. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears broader implications 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, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal and reinforces the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

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

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

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

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

Additional Comments

The scale of this project and the lack of community involvement and benefit is unfair, it will cause irreversible harm to the landscape, community and island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 45512063

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment considerations. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals serious deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, design, and proximity to the shore raise profound concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is inconsistent and limited, and numerous critical elements of the proposal remain unspecified. Furthermore, the reliance on a flexible design framework hinders a clear assessment of potential significant effects, while the unspecified mitigation measures mean their effectiveness cannot be judged. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Additionally, there are significant conflicts with existing policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately show that national standards for protecting biodiversity, climate interests, and environmental integrity can be upheld. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposed development, with large turbines situated close to the coastline, raises urgent concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and incapable of sustaining a lawful decision. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises serious concerns regarding its impact on marine ecology and protected species in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the assessment presented is materially deficient, lacking a comprehensive and reliable understanding of the ecological receptors present. The methodologies employed do not effectively capture

critical aspects of species presence, behaviour, and habitat use, resulting in an incomplete baseline.

One significant oversight is the failure to adequately recognise and assess the presence of otters, a European Protected Species, which actively forage and move through coastal regions. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased human activity remain unexamined. This gap undermines any conclusions regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which are prone to detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of these sharks when compared to established land-based observations that indicate a regular use of these waters. The neglect of such relevant data leads to an inadequate baseline and compromises the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertion of negligible or non-significant effects is based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and interactions within the broader ecosystem. This uncertainty raises questions about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The resulting uncertainty prevents the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as an active cultural landscape where the environment, language, tradition, and community are interlinked. Rather than acknowledging the dynamic social, cultural, and spiritual functions of heritage, the application treats it as a collection of discrete, unchanging assets.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment regards them merely as

static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and neglects their integral role in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding connection between the community and its coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the evaluation, representing a considerable gap. The absence of these considerations means that the cultural implications of the proposed development cannot be accurately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community possesses a distinct cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the validity of the assessment and neglects established principles of participation concerning cultural and environmental decisions.

Additionally, a critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This absence alone renders any determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historical assets and locations. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear violation of policy stipulations.

Ultimately, the lack of assessment concerning living heritage, intangible cultural values, community rights, and statutory duties culminates in a substantial evidential void. The cultural ramifications of the proposed development have not been adequately explored, and the application lacks a robust foundation for assessing the true cultural costs associated with the project.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to an active fishing industry and a diverse marine ecosystem. The application does not adequately protect or maintain these crucial habitats and activities from significant disruption. There is a primary issue regarding the presumption that fishing activity can be displaced without consequences. The absence of evidence to suggest that alternative fishing grounds are available, accessible, or capable of handling additional pressure is a critical omission. Such displacement could lead to overfishing in other areas, potentially harming the local fleet's economic viability.

Moreover, the proposal poses substantial risks to marine species, especially due to

underwater noise created during construction. The anticipated high-energy hammer piling could disturb marine life over considerable distances, particularly impacting species like dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these effects without adequate evidence.

There are inconsistencies within the application regarding the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application does not adhere to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding sustainable development.

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

TOURISM

The tourism sector on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which now supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment of the application inadequately addresses the potential economic and social impacts on this critical sector. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a 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, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment neglects to evaluate how the industrialisation of the seascape and a loss of environmental quality could affect the Tourism Gross Value Added and broader economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would generate a net economic benefit or hinder a sector that is already established and growing.

The role of environmental quality in supporting tourism is also overlooked, particularly

concerning the significance of unspoiled landscapes and dark skies for visitor experiences, which are crucial for emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights this deficiency, creating a major gap in understanding the impacts on an increasingly recognised aspect of the local economy.

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

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

Taken collectively, the absence of a detailed quantification of tourism impacts, the lack of consideration for environmental factors influencing visitor behaviour, and the oversight of the island's economic dependency lead to a significant evidential gap. This gap inhibits 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 indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably, there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural

identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

Thesw windmills are spoiling the beautiful Scottish landscape and harming wildlife. The Isle of Lewis is one of the most unspoiled and beautiful places left in the world. There is no light pollution and now you want ruin it and make it like everywhere else. Ruining God's nature.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: CA2AD2CB

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary thoroughness and transparency, failing to present a reliable overview of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This uncertainty impedes the consistent application of a worst-case scenario analysis, thereby compromising the assessment's integrity. As a result, the potential impacts may not accurately represent what will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the full extent of environmental consequences.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought under the premise that any environmental harm will be mitigated in the future, obstructing a thorough evaluation of these measures' effectiveness or an assessment of any residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, as it contradicts the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

Moreover, there are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in ambiguity concerning the scale and significance of impacts, especially where negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to satisfy requirements relating to biodiversity protection and environmental integrity, as it cannot confirm that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

Overall, the combination of reliance on an unspecified design envelope, lack of defined mitigation measures, and the gaps present in baseline data contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to 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 assessment of marine ecology and protected species presents significant deficiencies, failing to deliver a comprehensive or trustworthy understanding of ecological receptors in the West Lewis coastal environment, which is known to be a sensitive and biologically rich marine system. The incomplete baseline data and inadequate methodologies fail to capture essential aspects of species presence, behaviour, and habitat use. Consequently, this leads to an unreliable evidential basis for evaluating potential impacts.

One critical gap in the assessment involves otters, classified as a European Protected Species. The application does not adequately recognise or assess their active usage of

coastal regions for foraging and movement. The disregard for their core foraging ranges and behavioural patterns results in an insufficient evaluation of the potential effects of construction disturbance, noise, and increased human activity, ultimately compromising the conclusions regarding the absence of significant effects on this species.

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

The methodological shortcomings mean that findings of 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, which includes seasonal variations and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been properly executed. The uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, it is unlawful to grant consent.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a solid 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 evaluation of cultural heritage and community identity is severely lacking, as it overlooks the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply interconnected. The application simplifies heritage into separate, unchanging assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice; however, the assessment designates them as static elements, failing to recognise their continued relevance, meaning, and the

potential impact of development on their surroundings. This misrepresentation 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, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community has with the coastal environment. These aspects are vital to the identity of the area, yet they are completely omitted from the assessment, which is a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation concerning cultural and environmental interests.

A significant procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic sites and landscapes. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear deviation from policy mandates.

Overall, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application falls short of providing a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts are

based on direct engagement with the community and are therefore substantiated rather than speculative. However, the failure to disclose the full assessment prevents proper scrutiny of these findings and constrains the ability to assess their significance in the decision-making process.

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

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functioning. Without access to the complete dataset, the application falls short of providing a full evidential basis for balancing potential benefits against harm.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is severely lacking and does not truly capture the extent of change nor the sensitivity of the environment in question. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Furthermore, the application fails to accurately depict the magnitude of the visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and

remoteness. The assessment does not adequately communicate the significance of these impacts in relation to such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises the possibility that the true extent of the visual impact has been minimised, thus compromising the reliability of the assessment.

Moreover, there is a critical failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging 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 perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact; it represents a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, this proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The degree of change proposed is incompatible with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

Additionally, it is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, 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 confirm that the proposal is incompatible with the protection of this precious landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks presented in this application is significantly lacking and fails to deliver the necessary detail for a thorough assessment of potential environmental impacts. Involvement in extensive seabed preparation and installation activities in a high-energy Atlantic setting is proposed, yet there are no well-defined Construction Environmental Management Plans or Pollution Prevention Plans

in place. Instead, the application leans on mitigation and contingency strategies that are intended to be formulated after consent has been granted, inhibiting a genuine appraisal of their potential effectiveness or adequacy.

This dependency on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are sensitive to disturbances from sediment and contamination. Although the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide ample detail on preventative, control, or monitoring strategies.

There is also considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly established management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats recognised as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent can be granted, and in the absence of this information, a lawful determination is unattainable. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation strategies, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal is fundamentally flawed due to several critical deficiencies in its assessment of fisheries and marine life, which do not adequately address ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide assurances that these vital uses and habitats will be protected from significant disruption.

One of the major shortcomings of the proposal is the assumption that fishing activity

can simply be displaced without repercussions. The application lacks any evidence to support the claim that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure that displacement would cause. This oversight is crucial, as it poses a risk of overfishing in alternative areas and could have broader economic implications for the local fishing fleet. Without a comprehensive, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain obscure.

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted effects on a significant portion of the local bottlenose dolphin population. Despite these serious implications, the application downplays these impacts without providing adequate supporting evidence.

A notable inconsistency exists within the application itself, acknowledging the necessity of licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction raises questions about the validity of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to a degree that necessitates legal approval.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not substantiate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, ultimately failing to establish that the proposal represents sustainable development.

In summary, the combination of inadequate evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment fundamentally incomplete and unreliable. These shortcomings obstruct a meaningful evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore works entail significant developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As it stands, the application does not provide a thorough assessment of these impacts, thus failing to convey the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project must be considered collectively. However, the disjunction between offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which play a crucial role in the environmental quality, cultural identity, and tourism value of the area. However, the proposal introduces permanent red aviation lighting that would be visible

over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the emerging sector of astro-tourism, this omission is particularly concerning and highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are vulnerable to disorientation caused by phototaxis, which can increase their risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal neglects to consider how aviation lighting might affect 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 capture nocturnal activity and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the potential ecological impacts.

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

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

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife constitutes 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 regarding the impacts on tourism is fundamentally inadequate, neglecting to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. While the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

This sector has seen considerable growth, with revenues rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up approximately 16% of the island's economy. However, the application does not model the potential effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience. Such an absence of analysis means it is impossible to ascertain whether the development would offer a net economic advantage or jeopardise an established and flourishing sector.

The evaluation also overlooks the significance of environmental quality in sustaining tourism, failing to recognise how unspoiled landscapes and dark skies enhance visitor experiences and contribute to burgeoning markets such as nature-based tourism and astro-tourism. Furthermore, the lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable oversight regarding the impact on a recognised and expanding segment of the local economy.

In a community with limited economic diversification, neglecting the impact on tourism has broader implications for employment opportunities, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately examined, as required under the Islands (Scotland) Act 2018.

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

The combined shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependence create a significant gap in evidence. This deficiency hinders a thorough assessment of economic effects, leading 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 for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. The application revisits core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is being considered under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis provided for the determination of this application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways, including effects on nocturnal wildlife,

comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment constitutes a significant omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate the protection of biodiversity, natural spaces, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been appropriately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist, as assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

As a resident of Lewis and a parent raising my family here, I wish to object to this proposed development due to the significant and lasting impact I believe it would have on the west coast of Lewis and the wider Hebrides.

I fully appreciate the importance of renewable energy and the need to move towards

more sustainable forms of power generation. However, I do not believe a development of this scale should be located so close to such a sensitive, internationally recognised landscape and coastal environment.

I grew up on these islands and feel incredibly fortunate to now be bringing up my own children here. The west coast of Lewis is valued not only for its scenery, beaches, wildlife and dark skies, but also for its sense of peace, openness and cultural identity. These are qualities that cannot easily be replaced once industrial development of this scale is introduced.

I am concerned about the visual impact of turbines of this height being placed so close to shore, and the effect this could have on the character of the coastline, tourism, local communities and people's wellbeing. I also have concerns regarding potential impacts on marine ecology, seabirds, wildlife, fisheries and the wider natural environment, particularly given how important these habitats are to the islands.

Tourism is a vital part of the local economy, with many visitors coming specifically to experience the unspoilt landscapes and natural beauty of the Hebrides. I worry this proposal risks changing the very thing that makes Lewis unique.

Most importantly, I want these islands to remain a special place for future generations. I want my children and, one day, their children, to experience the same natural beauty, community and connection to the landscape that I was fortunate enough to grow up with.

For these reasons, I respectfully object to this application. I strongly believe renewable energy developments should be located in more appropriate offshore locations, further from vulnerable coastlines, communities and nationally important landscapes, rather than permanently industrialising one of the most unique and valued environments in the Hebrides.

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: E9213ABA

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 grounded in a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, a region notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, particularly its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation for lawful determination. It presents critical gaps in environmental data, limited and inconsistent baseline information, and key elements of the proposal that remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, and the claims of negligible or non-significant effects are unsupported by reliable evidence.

There are clear and substantive conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are central to the statutory tests required 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, with large turbines positioned in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy underscore that the application is incomplete and incapable of sustaining 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, lacking a comprehensive and transparent account of the potential environmental effects associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the integrity of the assessment is compromised, and the impacts presented may not accurately reflect the development that will ultimately be constructed. This situation prevents both the public and the competent authority from grasping the true extent of the environmental effects involved.

Furthermore, the application heavily relies on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation be clearly identified prior to determination.

Additionally, there are substantial evidential deficiencies within the report. These include gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, this leads to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate adherence to the National Planning Framework 4, which includes mandates regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It overlooks this area as a living cultural landscape where

environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of isolated and unchanging assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. The assessment fails to consider their continued use and meaning, along with the potential impact of development on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the complete Social Impact Assessment fundamentally undermines the assessment of social impacts, health, and wellbeing, leaving it materially deficient and lacking the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This represents a significant evidential gap, impeding both public understanding and the competent authority's ability to grasp the full extent of the social risks identified in the developer's own research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are therefore not speculative in nature. However, the non-disclosure of the full assessment restricts proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" identified as an issue within the developer's own findings. Nonetheless, these concerns have not been adequately integrated into the main application or assigned appropriate weight. The withholding of the complete Social Impact Assessment obscures the true human and social 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 crucial for developments of this magnitude, especially when the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Development is required to support positive health outcomes and mitigate harm. However, the evidence available indicates existing adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a material omission within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is severely lacking and does not truly capture the extent of change nor the sensitivity of the environment in question. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Furthermore, the application fails to accurately depict the magnitude of the visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts in relation to such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises the possibility that the true extent of the visual impact has been minimised, thus compromising the reliability of the assessment.

Moreover, there is a critical failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging 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 perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact; it represents a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, this proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The degree of change proposed is incompatible with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

Additionally, it is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level.

through mitigation efforts.

In conclusion, 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 confirm that the proposal is incompatible with the protection of this precious landscape.

FISHERIES AND MARINE LIFE

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

A primary concern is the flawed assumption that fishing activity can be displaced without consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of handling increased pressure. This significant omission raises the risk of overfishing in other areas and could have wider economic repercussions for the local fishing fleet. The implications for fisheries and livelihoods cannot be properly assessed without a clear and evidence-based approach.

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

There is a clear inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing those impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not address cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies regarding the lack of evidence on fishing displacement,

the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings inhibit a robust evaluation of the impacts on marine life and fisheries.

TOURISM

The application inadequately assesses tourism impacts and neglects to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. The area's tourism is fundamentally reliant on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery, yet there is no quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without such an evaluation, it remains unclear whether the proposed development would provide a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a major gap in understanding the impacts on this acknowledged and growing component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate impacts on tourism has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been duly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show 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 consequences of the proposal.

Overall, the lack of quantification of tourism impacts, failure to assess environmental influences on visitor behaviour, and disregard for the island's economic dependence culminate in a significant 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 fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation were identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with negative impacts on tourism, would result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The myriad of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The

competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

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: B841B77E

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is inadequate and fails to meet the necessary statutory requirements of the Environmental Impact Assessment regime. Rather than offering a well-structured comparison of realistic alternatives

based on environmental effects, the application provides a narrative of project evolution. This lack of analysis does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

In particular, there is no clear or evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be reduced. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in determining impact, underscores the necessity for this analysis. The absence of such consideration undermines any claim that the proposed siting is the least damaging option available.

Furthermore, these shortcomings extend to the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and failure to conduct comparative analysis suggest that mitigation by design has not been employed, with a reliance instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from determining whether more appropriate and less harmful alternatives exist. The absence of a robust alternatives assessment further casts doubt on the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology within the West Lewis coastal environment is deeply flawed, lacking a comprehensive understanding of the ecological receptors present in this biologically active marine system. The methodologies employed are inadequate, failing to capture essential data regarding species presence, behaviour, and habitat usage. Consequently, the baseline data remains incomplete, and the evidential foundation for evaluating potential impacts is significantly weakened.

A critical gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately address their foraging activities and movement across coastal areas. Without a thorough evaluation of their core foraging ranges and behavioural patterns, the potential impacts of construction

disturbances, noise, and increased activity are not sufficiently examined. This oversight raises serious questions about the validity of claims regarding the lack of significant effects on this species.

Similarly, the evaluation of basking sharks suffers from serious methodological shortcomings. The reliance on aerial surveys introduces a significant detection bias, particularly in challenging Atlantic conditions. This bias likely leads to an underestimation of their presence, especially when compared to established land-based observations that demonstrate frequent activity in these waters. The failure to adequately incorporate such data results in an incomplete baseline, further undermining the reliability of the conclusions drawn.

The methodological deficiencies present mean that any conclusions drawn about negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of sufficient baseline data complicates the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such uncertainties elevate the risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess the presence of protected species. The uncertainties introduced by these deficiencies prevent any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, the lawful granting of consent is not achievable.

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

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 inadequacy of the assessment regarding cultural heritage and community identity cannot be overstated. It fundamentally overlooks the West Lewis coastline, which should be recognised as a dynamic cultural landscape where the interplay of environment, language, tradition, and community is essential. The application simplistically treats heritage as disconnected, static entities, ignoring their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of sites that hold deep cultural significance, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites for burial and spiritual practice. By failing to acknowledge their continued use and meaning, the assessment provides an incomplete understanding of the cultural effects of the development, thereby neglecting their vital role in community life.

Moreover, the assessment lacks consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring bond between the

community and the coastal environment. These elements are integral to the area's identity, yet they are wholly absent from the assessment, highlighting a severe oversight. Without addressing these aspects, the true cultural impact of the development remains obscured.

Equally troubling are the concerns surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the validity of the assessment and ignores established principles that should guide participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. The lack of this assessment hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which alone compromises the legality of the determination.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices indicate a clear divergence from policy requirements.

In summation, the collective failure to address living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not offer a sound basis for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is severely lacking, leading to significant concerns about the adequacy of the evaluation. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence restricts both public insight and the competent authority's understanding of the social risks highlighted in the developer's own research.

Local residents are already feeling measurable stress, anxiety, and worry due to the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are not speculative. However, the absence of the complete assessment hampers thorough scrutiny of the findings and limits the ability to evaluate their importance in the decision-making process.

Moreover, there is a perception among community members that the proposal threatens their identity and cohesion, with indications of "cultural loss" appearing in the developer's findings. Unfortunately, these impacts have not been adequately

considered in the main application, nor have they been given the weight they deserve. The decision to withhold the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application fails to provide a solid evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence currently suggests pre-existing adverse effects that have not been adequately disclosed. Therefore, without the full assessment, it is impossible to confirm compliance with this policy.

The implications for procedure are significant, as the competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is significantly lacking and does not adequately capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic views, undeveloped nature, and pronounced sense of remoteness. Introducing large turbines near the shoreline would create a dominant industrial presence that fundamentally transforms this character, leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the magnitude of this visual change accurately. The size and close proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not sufficiently illustrate the significance of this impact in the context of such a delicate landscape.

Methodological issues also arise concerning how visual viewpoints have been selected and presented. There is evidence to suggest that these viewpoints may not fully encompass the most sensitive receptors or worst-case scenarios, particularly

regarding critical cultural heritage sites and valuable landscapes. This raises concerns that the scale of visual impact may have been underestimated, thus compromising the assessment's reliability.

Additionally, the application neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially connected to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This signifies not only a visual impact but also a more profound cultural and spatial detriment that has not been sufficiently appraised in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic sites. The extent of change is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on unspecified future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. The application has acknowledged various risks, including sediment mobilisation and accidental chemical or oil spills, yet it fails to provide adequate detail on the strategies needed to prevent, control, or monitor these risks.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, but it does not include fully developed Construction Environmental

Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, which hinders any meaningful assessment of their adequacy or effectiveness.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes generated by 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 encompasses potential effects on marine species and habitats that are already recognised as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application fails to allow for evaluation of whether adequate safeguards are in place to address pollution incidents. This approach not only introduces procedural risk but also 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 outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is inadequate and lacks a thorough evaluation of ecological and socio-economic impacts. A crucial concern is the assumption that fishing activities can be displaced without consequences. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This gap in information is significant, as such displacement poses risks of overfishing in other areas and could lead to wider economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the impacts on fisheries and local livelihoods is compromised.

Moreover, the proposal presents notable risks to marine species, particularly due to the underwater noise produced during construction activities. High-energy hammer piling, expected to occur over an extended period, could create disturbances across

considerable distances, adversely affecting species like dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises substantial concerns; however, the application downplays these effects without adequate supporting evidence.

There is also a discernible inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction casts doubt on the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment overlooks cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders the determination of the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment culminate in an incomplete and unreliable evaluation. These flaws obstruct a thorough understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking, failing to consider the full scope of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet they have been evaluated separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Excavation will occur in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically delicate habitat. As a result, the application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The failure to assess the onshore impacts, whether by exclusion or deferral, inhibits proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively.

However, the division of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate a thorough evaluation of impacts on these habitats or the application of appropriate avoidance measures, thus revealing a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or show that the overall carbon balance is beneficial.

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

From a policy perspective, the failure to assess the project comprehensively and to demonstrate protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further 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 aspect of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the importance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The lack of consideration for these impacts indicates a clear shortfall in the overall landscape and environmental evaluation.

Moreover, the application does not include any assessment of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's

Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates remain unexamined.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The lack of site-specific night-time data creates a serious shortcoming in understanding ecological impacts.

Without an assessment of 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 cannot be satisfied, thus invoking the precautionary principle and preventing a lawful decision.

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

In summary, the absence of any assessment regarding dark skies and nocturnal wildlife represents a major 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 does not adequately address the tourism impacts that are crucial to the economy of the Isle of Lewis. With tourism reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness, the application's acknowledgment that 86% of visitors are attracted by scenery is insufficient. There is no quantified assessment of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen 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 fails to model the potential impact of industrialising the seascape and degrading environmental quality on Tourism Gross Value Added and the broader economic resilience of the island. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or hinder a vital and expanding sector.

The environmental quality that underpins tourism is not sufficiently considered,

particularly regarding the significance of unspoiled landscapes and dark skies for visitor experience, as well as for emerging markets like 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 a growing segment of the local economy.

For an island community with limited economic diversification, the neglect to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as required by the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the requirement for net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This deficiency obstructs a thorough 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.

Additional Comments

This windfarm is far too big and far too close to the shore. There hasn't been enough consideration taken of how this will affect animals and people living nearby. I am also concerned about the impact of this proposal on house prices for local people, leaving us essentially trapped if the noise/disruption becomes intolerable.

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: 77722AEC

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing notable deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. 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 rich cultural identity. Concerns about the scale, proximity, and design of the project cast doubt on its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. Furthermore, the flexible design framework employed creates ambiguity regarding potential significant effects. The reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There exist clear and substantial conflicts with policy. The proposal demonstrates inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly challenge the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines positioned dangerously close to the shoreline. This raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance highlights the application's incompleteness and its inability to facilitate a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to provide a comprehensive account of the anticipated environmental effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This uncertainty undermines the integrity of the assessment, meaning that the impacts outlined may not accurately represent the final development, thus preventing both the public and the competent authority from fully understanding the true extent of environmental effects.

The application depends substantially on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly established before any determination is made.

Furthermore, there are serious evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This triggers 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 has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the

project's evolution. This narrative does not demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has considered placing turbines further offshore, where visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the absence of such analysis undermines any claim that the proposed siting represents the least damaging option.

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

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

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate assessment and therefore cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a comprehensive or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of the species within this marine system. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant oversight involves the otters, classified as a European Protected Species, where the application neglects to appropriately acknowledge and assess their usage of coastal regions for foraging and movement. Without considering their core foraging range and behavioural tendencies, the assessment does not adequately address the possible impacts of construction-related disturbances, noise, and increased human

activity. This shortcoming undermines any conclusions drawn about the lack of significant effects on this particular species.

Moreover, the evaluation of basking sharks reveals further deficiencies; reliance on aerial surveys leads to substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that suggest these waters are frequently used by the species. The oversight in incorporating or accurately considering such information leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that conclusions regarding negligible or non-significant effects are largely based on assumptions rather than solid evidence. Additionally, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and the broader ecosystem interactions. This uncertainty clouds the true extent of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been no thorough identification or assessment of protected species. The uncertainty generated by these deficiencies obstructs the exclusion of adverse effects beyond reasonable scientific doubt, necessitating adherence to the precautionary principle. In light of these considerations, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings that fundamentally undermine its credibility. Key foraging areas and migratory pathways critical to the internationally important seabird populations along the west coast of the Isle of Lewis are not adequately addressed. Despite the development being located within these vital zones, the assessment fails to convincingly demonstrate, to the necessary evidential standard, that these species will not be adversely affected. The implications of potential displacement, collision risk, and habitat loss are insufficiently evaluated.

Moreover, a notable contradiction exists in the application, as the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically required only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by solid

evidence.

The assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is inadequately acknowledged, and the reliance on modelling methods creates further uncertainty, particularly for species already in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor poses additional risks, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential impacts on species with relatively small global populations, are not properly assessed.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion that would support consent.

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

In conclusion, the assessment is rendered unreliable by its internal inconsistencies, methodological flaws, and insufficient evidence. These issues inhibit a thorough evaluation of the impacts and culminate in the assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the application neglects to examine intangible cultural heritage, which includes the Gaelic language, local traditions, and the historical bond between the community and the coastal landscape. These aspects are crucial to the area's identity but are entirely omitted from the assessment, constituting a significant oversight. Without addressing these elements, the cultural ramifications of the development remain inadequately understood.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report has not been published. This lack of transparency creates a significant evidential gap, limiting both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by direct engagement and not mere speculation. However, the failure to disclose the complete assessment prevents adequate scrutiny of these findings, ultimately hindering the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, these concerns have not been fully integrated into the main application or given the appropriate consideration they warrant. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. The absence of the complete dataset means that the application does not present a full evidential basis for weighing the benefits against the harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and avoid negative consequences. However, the available evidence suggests that existing adverse effects have not been fully disclosed, making it impossible to demonstrate compliance without the full assessment.

The procedural implications of this situation are substantial. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a significant omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This undermines lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of landscape, seascape, and visual impacts is significantly inadequate and does not reflect the scale of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the shoreline would establish a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application does not sufficiently address the magnitude of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to accurately convey this level of impact or its significance within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and valuable landscapes. This raises concerns that the visual impact's magnitude may have been understated, thus compromising the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these critical relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not just a visual impact, but also a 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 concerning the protection of natural places and historic assets. The extent of change is at odds with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings 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 in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the detail needed to evaluate potential environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, hindering any meaningful assessment of their adequacy.

This reliance on undefined future measures is especially troubling given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide enough detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be reached. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, detailed management plans, and the uncertainty about potential impacts render the assessment deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A primary concern is the assumption that fishing activity can be displaced without consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting additional pressure. This is significant, as such displacement risks overfishing elsewhere and could have wider economic repercussions for the local fleet. Without a clear, evidence-based assessment, the impacts on fisheries and livelihoods remain poorly understood.

The proposal also poses substantial risks to marine species, particularly through underwater noise generated during construction. High-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns. However, the application downplays the significance of these effects without sufficient supporting evidence.

There is an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially where harm is anticipated that requires legal authorisation.

Additionally, the assessment does not consider cumulative impacts from multiple pressures, including habitat disturbance, noise, and displacement of fishing activity. Without a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not 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, preventing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough evaluation of the onshore infrastructure, which is critical as it forms part of a singular integrated project alongside the offshore turbines. By assessing these components separately, the proposal adopts a fragmented approach, obscuring the true extent of the environmental and socio-economic repercussions. This is particularly concerning given the onshore elements, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through delicate landscapes. These activities involve excavation through deep peat areas, especially within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. As a result, the application does not deliver a complete assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the disconnection between

offshore and onshore elements means the combined effects on peatlands, habitats, and local communities remain largely unexamined. Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these vital habitats have been fully assessed or that appropriate measures to avoid harm have been implemented, creating a significant gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, potentially leading to a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not adequately tackle this concern or provide assurance that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with current land use and legal rights. The lack of evidence confirming that the required consents or processes have been initiated casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and demonstrate adequate protections for peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Ultimately, the separation of the project components, the absence of a comprehensive assessment, and the lack of evidential support regarding environmental and land use impacts culminate in an incomplete and unreliable submission, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism value. The proposal to install permanent red aviation lighting introduces a visible intrusion that creates a continuous “wall of light” across the western horizon, fundamentally changing the night-time environment. The Environmental Impact Assessment completely omits an evaluation of how this lighting affects visual amenity, landscape character, and the experience of residents and visitors, despite the recognised significance of dark skies to the local identity and burgeoning sectors such as astro-tourism.

Additionally, the application lacks any 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, which can face disorientation and increased collision risks due to phototaxis. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and their mortality rates remain unexamined. This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Other species like Kittiwakes, which may forage or migrate at night, also face threats from artificial lighting that have not been adequately

assessed. The lack of site-specific night-time data leads to a critical gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be negatively affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, the broader evaluation of landscape and seascape impacts is compromised, as night-time character is an essential aspect of the environment.

In conclusion, the lack of any assessment of dark skies and nocturnal wildlife creates a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit 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 proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, the process has encountered clear procedural failings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components is

insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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

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

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

Additional Comments

The detriment to the islands should not be underestimated - which includes the expected reduction in house prices and loss of tourism (and resulting income loss).

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: 3423D667

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the scale, proximity, and design of the wind farm raise serious questions regarding its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination, with critical environmental data either missing or inadequate. Baseline information provided is inconsistent, and several key elements of the proposal remain undefined. The flexible design framework employed prevents a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their efficacy unverified. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects are not underpinned by credible evidence.

Moreover, there are explicit and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns, particularly with large turbines positioned alarmingly close to the shoreline. This raises issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, reliance on vague mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent analysis of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking fixed turbine dimensions, layouts, or configurations, creates considerable uncertainty. This variability hinders the ability to apply a worst-case scenario consistently, compromising the reliability of the assessment and obscuring the true environmental impacts. Consequently, both the public and the competent authority are left without a clear understanding of the actual effects of the development.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent on the premise that environmental harm will be mitigated in the future undermines any meaningful evaluation of the proposed measures' effectiveness and the assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly outlined before any decision is made.

The assessment is also marred by significant evidential shortcomings, including gaps in baseline data and methodological limitations. The reliance on assumptions rather than site-specific evidence introduces uncertainty regarding the magnitude and importance of the impacts. This is particularly concerning when conclusions of negligible or non-significant effects are presented without sufficient data to support them. The lack of adequate information hinders a comprehensive understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not align with statutory obligations.

Consequently, the application fails to meet the evidential criteria set forth in the Habitats Regulations, which necessitate excluding adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, specifically with respect to biodiversity protection and environmental integrity, as it cannot substantiate that all impacts have been thoroughly assessed or that appropriate protective measures are in place.

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

ASSESSMENT OF ALTERNATIVES

The lack of a structured and comparative assessment of alternatives represents a significant deficiency in the application, undermining compliance with the Environmental Impact Assessment regime. It fails to provide a thorough evaluation of

realistic alternatives based on environmental effects and instead offers only a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified or assessed in preference to more damaging solutions.

Furthermore, the application does not include a transparent or evidence-based comparison of different offshore locations, development scales, or design configurations. Specifically, it does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be reduced. The sensitivity of the West Lewis coastline is crucial, and the absence of analysis regarding proximity to shore prevents any conclusion that the proposed siting is the least damaging option.

Deficiencies in cable routing and landfall assessment are also evident, as there is insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation through design has not been applied, leading to a reliance 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 appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be established that the proposal is sustainable or compliant with policy.

From a policy standpoint, these inadequacies compromise alignment with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured assessment is a material omission that contributes to the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology within the West Lewis coastal environment is deeply flawed, lacking a comprehensive understanding of the ecological receptors present in this biologically active marine system. The methodologies employed are inadequate, failing to capture essential data regarding species presence, behaviour, and habitat usage. Consequently, the baseline data remains incomplete, and the evidential foundation for evaluating potential impacts is significantly weakened.

A critical gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately address their foraging activities and movement across coastal areas. Without a thorough evaluation of their core foraging ranges and behavioural patterns, the potential impacts of construction disturbances, noise, and increased activity are not sufficiently examined. This oversight

raises serious questions about the validity of claims regarding the lack of significant effects on this species.

Similarly, the evaluation of basking sharks suffers from serious methodological shortcomings. The reliance on aerial surveys introduces a significant detection bias, particularly in challenging Atlantic conditions. This bias likely leads to an underestimation of their presence, especially when compared to established land-based observations that demonstrate frequent activity in these waters. The failure to adequately incorporate such data results in an incomplete baseline, further undermining the reliability of the conclusions drawn.

The methodological deficiencies present mean that any conclusions drawn about negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of sufficient baseline data complicates the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such uncertainties elevate the risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess the presence of protected species. The uncertainties introduced by these deficiencies prevent any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, the lawful granting of consent is not achievable.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable contradiction in the application. The developer claims that there will be no significant adverse effects while also 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 conclusions drawn are not substantiated by the available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such

as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies noted also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential 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 treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These locations are active burial sites and hold spiritual significance, yet they have been categorised as static features in the assessment. This approach neglects their ongoing use and meaning within the community and fails to address how the proposed development will impact their setting. Such mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their integral role in community life.

Moreover, the assessment disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions, along with the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the evaluation. Ignoring these factors means that the cultural impact of the development cannot be accurately comprehended.

Community rights and engagement also remain inadequately addressed. The Gaelic-

speaking population, which possesses characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to reflect established principles for participation in decisions that affect cultural and environmental interests.

A critical procedural failure is evident in 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 fulfill its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

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

Ultimately, the combined 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 evaluated, leaving the application insufficient for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. By failing to provide the complete dataset, the application

lacks a solid evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and prevent harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, fostering a strong sense of remoteness. The proposed large-scale turbines would be positioned near the shoreline, imposing a continuous and dominant industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

The application fails to accurately depict the magnitude of the visual change that would occur. The height and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define this environment. This significant level of impact has not been adequately conveyed in the assessment.

There are also serious methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. Such shortcomings risk understating the true magnitude of visual impact, which compromises the overall reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship among landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to provide a thorough worst-case assessment further weakens any assertion of compliance with policy.

Moreover, it is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately capture the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These critical 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 involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks remains incomplete, lacking the detail necessary to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures to be formulated post-consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning due to the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed before consent is granted; the absence of such information means a lawful determination cannot be achieved. The application further fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application 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 proposal involves significant infrastructure that includes cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These works necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. However, the application does not offer a thorough assessment of these impacts, limiting the ability to fully comprehend the project's overall environmental footprint.

Furthermore, the assessment of onshore infrastructure is materially incomplete and fails to consider the entirety of impacts stemming from this single integrated project. The offshore turbines and onshore works are intrinsically linked yet are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects, as it prevents a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; however, the separation of offshore and onshore elements results in a lack of understanding regarding the combined impacts on peatlands, habitats, and local communities.

There are additional concerns regarding sensitive habitats, such as machair systems and peatland environments that are protected by policy. The application does not sufficiently demonstrate that the impacts on these critical habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, revealing 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 lacks evidence that the necessary consents or processes have been initiated, which introduces uncertainties regarding deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant shortcoming in the Environmental Impact Assessment. The West Lewis coastline is renowned for 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 will be visible over extensive distances, creating a continuous "wall of light" effect across the western horizon. This alteration will fundamentally disrupt the night-time environment.

Furthermore, the application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the crucial role that dark skies play in the area's identity and in burgeoning sectors like astro-tourism. The failure to consider these impacts leaves a notable gap in the landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application lacks any lighting impact assessment or phototaxis study, resulting in an oversight of how the proposed aviation lighting may affect these species and potentially increase mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which fails to capture the nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, also face the threat of disorientation from artificial lighting, yet this has not been properly assessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific

doubt is not met, necessitating the application of the precautionary principle and obstructing a lawful determination.

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

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

TOURISM

The tourism sector on the Isle of Lewis has experienced notable growth, with its value increasing from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and contributing up to 16% of the island's economy. However, the planning application lacks a comprehensive assessment of the potential impacts on this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, the application fails to quantify how large-scale offshore infrastructure might alter visitor numbers, behaviours, or economic contributions.

Tourism relies heavily on the area's unspoiled coastline, near-pristine landscapes, and dark skies, all of which enhance the visitor experience. The assessment neglects to consider the significance of environmental quality in tourism, including the emerging markets of nature-based and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a crucial gap in understanding how the proposed development could impact these growing sectors of the local economy.

In a community with limited economic diversification, the failure to evaluate the effects on tourism has broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent in this situation 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 impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, understanding the environmental drivers influencing visitor behaviour, and considering the island's economic reliance culminate in a significant evidential void. This absence hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary criteria for sustainable development when measured against statutory obligations, national policy, and evidential standards. It mirrors the significant issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Although this application is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is lacking within the application. It contains critical gaps in baseline data, continues to employ an undefined design envelope, and relies on unspecified mitigation measures. Additionally, it omits crucial impact pathways related to nocturnal wildlife, complete onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a full understanding of significant effects or residual impacts.

Procedural deficiencies are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The application contradicts National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been adequately conducted, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing a lawful conclusion on the acceptability of impacts.

Furthermore, the proposal would result in 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 relationships, and the impacts on tourism would create permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information gaps, along with policy conflicts and unresolved environmental risks, preclude a lawful, evidence-based decision. Therefore,

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

Additional Comments

Not only do I believe this windfarm scale and closeness to Lewis to be wholly inappropriate, I believe the islands and its people do not benefit in any substantial way, especially considering the amount of profits that the windfarm owners and shareholders are expected to make over the windfarm's lifespan. Furthermore, the detriment to the islands, which includes an expected reduction in house prices and loss of tourism (and resulting income loss) is not being taken seriously with an already fragile environment.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 11995026

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient, lacking a complete, transparent, and reliable evaluation of the environmental effects anticipated from the proposal. The employment of a flexible Project Design Envelope, which does not

commit to specific dimensions, layouts, or configurations for the turbines, introduces a considerable degree of uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that is ultimately realised, which prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This request for consent implies that environmental harm will be managed subsequently, hindering any meaningful evaluation of the effectiveness of such measures and assessment of residual impacts. Deferring crucial information to stages after consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established prior to any determination.

There exist substantial evidential deficiencies, including gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, especially when 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 and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the combination of reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects and mean that the competent authority cannot adjudicate the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active, yet the methodologies employed have not adequately captured essential data regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight is the failure to appropriately assess otters, which are classified as a European Protected Species. The application does not recognise their active use of coastal areas for foraging and movement, and it inadequately addresses their core foraging range and behavioural patterns. This neglect means the potential effects of construction disturbance, noise, and increased human activity remain unassessed, undermining any claims regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with established evidential standards, particularly in relation to the integrity of protected sites. The ornithological assessment reveals internal inconsistencies and substantial gaps in evidence that critically undermine its conclusions. Despite the west coast of the Isle of Lewis hosting internationally important seabird populations, which are already experiencing declines, the application fails to adequately demonstrate that these species will not face adverse impacts. It is particularly troubling that the development is situated within vital foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the potential risks associated with displacement, collision, or habitat loss.

A serious contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously making a case for Habitats Regulations derogation—a process only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions presented lack robust support from the evidence provided. Furthermore, there is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects to fully account for the importance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially in instances where baseline data is lacking and species behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality within this corridor or its potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This activates the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Additionally, the deficiencies noted signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not suffer adverse effects positions the proposal in direct contradiction to national policy.

Overall, the unreliability of the assessment stems from its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is severely deficient, particularly in acknowledging the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of recognising the ongoing social, cultural, and spiritual roles of heritage within the community, the application adopts a simplified perspective, treating cultural heritage as a collection of fixed, isolated assets.

A significant shortcoming is the handling of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice. However, the assessment erroneously categorises them as static features, neglecting their current use and significance while disregarding the potential impact of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects and overlooks their integration into community life.

Moreover, the assessment fails to consider intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity and are notably absent from the evaluation, indicating a significant gap in the assessment process. Without acknowledging these factors, the true cultural implications of the development remain unclear.

Further, there are critical concerns regarding community rights and the need for proper engagement. The Gaelic-speaking population, which possesses distinct cultural characteristics akin to those of Indigenous Peoples, has not been subjected to a process of Free, Prior and Informed Consent. The lack of meaningful engagement in this context undermines the credibility of the assessment and fails to adhere to established standards for participation in decisions that affect cultural and environmental interests.

A crucial procedural deficiency is the omission of a compliant Island Communities Impact Assessment, a requirement stipulated by the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic consequences for the island community. This alone renders the determination unlawful.

These shortcomings ultimately place the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The disregard for both tangible and intangible aspects of heritage, as well as the failure to recognise living cultural practices, marks a clear deviation from policy expectations.

Collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential void. The cultural repercussions of the development have not been adequately assessed, leading to a lack of a solid foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the full Social Impact Assessment significantly undermines the integrity of the application. The developer engaged local residents through focus groups as part of the assessment, yet the comprehensive report remains unpublished. This omission creates a critical evidential gap that hinders public understanding and the competent authority's ability to evaluate social risks identified

by the developer's own research.

Available summaries highlight that residents are experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is limited, which restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this, the impacts have not been adequately incorporated into the main application or weighted appropriately. The withholding of the complete Social Impact Assessment obscures the real human and social costs associated with the development.

The implications of this lack of disclosure extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and function may be at risk. The failure to provide the complete dataset results in an application that does not present a comprehensive evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development must promote positive health outcomes and mitigate harm, available evidence suggests existing adverse effects that have not been fully revealed. The absence of the full assessment precludes any demonstration of compliance with this policy.

The procedural ramifications of this situation are substantial. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements established by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented is critically flawed, failing to accurately capture the significant impacts on seascape, landscape, and visual integrity. The West Lewis coastline, characterised by its open Atlantic horizon and untouched nature, possesses a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would impose a continuous industrial presence, drastically transforming this

unique character and causing an irreversible change to the landscape.

Significantly, the application does not sufficiently illustrate the extent of this visual change. The sheer scale and proximity of the turbines would overpower views from residential areas, historic landmarks, and popular coastal spots, directly diminishing visual amenity and compromising the area's intrinsic qualities of naturalness and remoteness. The assessment inadequately conveys the magnitude of this impact, which is especially concerning given the delicate nature of the landscape involved.

Methodological issues further complicate the evaluation, particularly regarding the choice and portrayal of visual viewpoints. Existing evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially in relation to important cultural heritage sites and landscapes of high value. This shortcoming raises doubts about the accuracy of the reported visual impacts, leading to an underestimation that undermines the credibility of the assessment.

Moreover, there is a notable failure to consider the interconnectedness of the landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape framework that connects them visually and spatially to the Atlantic horizon. Treating these heritage assets in isolation neglects their interdependence, resulting in a superficial understanding of the implications for their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how these heritage sites are perceived and disrupting their ties to the natural horizon. This concern extends beyond mere visual impact; it also encompasses a significant cultural and spatial harm that has not been thoroughly examined in the application.

From a policy standpoint, this proposal is at odds with the National Planning Framework 4, which aims to protect natural spaces and historic sites. The extent of the proposed changes is inconsistent with the need to maintain landscape character, visual amenity, and the settings of culturally significant areas. Additionally, the lack of a comprehensive worst-case impact assessment further discredits any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominate the landscape. This leads to a fundamental and permanent alteration that cannot be diminished to an acceptable level through any mitigation efforts.

In summary, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These substantial deficiencies preclude a reliable evaluation and reinforce the

conclusion that the proposal is fundamentally incompatible with the preservation of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks lacks the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on future mitigation and contingency measures that are intended to be established post-consent. This approach raises concerns as it hinders any meaningful assessment of the adequacy or effectiveness of these undefined measures.

Given the sensitivity of the receiving environment, which includes the West Lewis coastline with its clean coastal waters and important habitats vulnerable to sediment disturbance and contamination, this reliance on future planning is particularly troubling. The application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills but fails to provide adequate information on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed 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. Furthermore, this uncertainty extends to potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent has been granted, the application obstructs the 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 at the time of decision-making.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially incomplete assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is insufficient.

FISHERIES AND MARINE LIFE

The assessment lacks a thorough evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem as well as a thriving fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without significant disruption.

A key concern is the assumption made regarding the displacement of fishing activities without acknowledging the potential consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of handling any additional pressure. This absence of information is critical, as displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods they support remain inadequately understood.

Moreover, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over a prolonged period is expected to disturb species over considerable distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

The application reveals a glaring inconsistency; it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously characterising the anticipated impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal authorisation.

Additionally, the assessment overlooks cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these interconnected 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 National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal constitutes sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application introduces permanent red aviation lighting that will be visible over long distances, which could create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The assessment of dark skies and nocturnal wildlife is entirely lacking, representing a material omission within the Environmental Impact Assessment. The West Lewis coastline is defined by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly significant considering the importance of dark skies to the area's identity and the emerging sectors of tourism such as astro-tourism. The failure to consider these impacts results in a clear gap in the overall landscape and environmental assessment.

Furthermore, the application does not address the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study means there has been no evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This lack of assessment is compounded by the reliance on daytime survey data in the ornithological assessment, failing to capture nocturnal activity or associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding 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 satisfied, invoking the precautionary principle and inhibiting a lawful determination.

From a policy perspective, this omission is inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an essential aspect of the overall setting.

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

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this crucial analysis, it remains uncertain whether the proposed development would bring a net economic benefit or jeopardise an established and thriving sector.

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

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

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

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

SUMMARY

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

national policy, and evidential standards. It echoes the core issues of 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 robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for the determination of this application. The reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways, including nocturnal wildlife and full onshore infrastructure effects, render the Environmental Impact Assessment incomplete. Consequently, this lack of comprehensive data hampers the ability to fully understand the likely significant effects or residual impacts.

Moreover, there are procedural shortcomings that must be addressed. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete Social Impact Assessment represents a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience.

The proposal is inconsistent with National Planning Framework 4, which calls for the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The failure to properly assess the cumulative impact of both offshore and onshore elements obscures important effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals contain inconsistencies that fail to meet the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

the turbines will be an eyesore and the environmental impact could be devastating. i do not agree with this project

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: 5A023E8F

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation highlights significant planning, environmental, cultural, and procedural shortcomings. This development, located off the west side of the Isle of Lewis, occupies an area noted for its Atlantic-facing coastline, near-pristine environment, and deep cultural significance. Concerns regarding the scale, proximity, and design of the proposal raise urgent questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential basis for making a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework obscures the understanding of likely significant effects. Moreover, the proposal relies on unspecified mitigation measures, which makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust supporting evidence.

Moreover, the proposal conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such discrepancies directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to assess the development's acceptability within policy frameworks.

The unprecedented scale of this proposal, with large turbines positioned close to the shoreline, introduces serious concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a complete, transparent, and dependable account of the likely environmental effects associated with the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach undermines the reliability of the assessment and leads to the potential misrepresentation of the impacts, as it prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought on the assumption that environmental harm will be mitigated through undefined measures and management plans in the future. This reliance on yet-to-be-determined strategies obstructs any meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of essential information to the stages following consent is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which demands that likely significant effects and mitigation are clearly established prior to determination.

Moreover, the application exhibits significant evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty surrounding the scale and significance of impacts, especially when negligible or non-significant effects are suggested without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application fails to satisfy the evidential threshold outlined in the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable 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 inadequacies obstruct a lawful and rigorous assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is significantly inadequate and does not fulfil the statutory requirements set out in the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application merely presents a narrative of project evolution. This methodology does not substantiate that less harmful options have been properly identified, assessed, and chosen over more damaging

solutions.

Furthermore, there is a lack of transparent or evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered situating turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where insufficient evidence exists to confirm that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that mitigation through design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, which prevents the competent authority from ascertaining whether less harmful and more appropriate alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that leads to the overall 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 presents significant deficiencies, failing to deliver a complete or dependable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, there is no solid evidential basis for evaluating potential impacts.

Particularly concerning is the inadequate treatment of otters, a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to a failure in adequately assessing the potential effects of construction disturbance, noise, and increased activity. Such omissions

undermine any conclusions that suggest there are no significant effects on this species.

The assessment of basking sharks also presents further shortcomings, as it relies heavily on aerial surveys that introduce notable detection bias, particularly in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to properly consider or incorporate such data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological flaws imply that conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This gap creates uncertainty about 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 the identification and assessment of protected species have not been conducted properly. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be legally granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These shortcomings impede a thorough 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 is fundamentally flawed, presenting significant gaps in evidence and internal contradictions that severely undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are currently in decline. However, the application does not adequately demonstrate that these species will not be adversely affected by the development. It is located within key foraging areas and migratory pathways, yet the assessment fails to robustly consider the implications of potential displacement, collision risks, and habitat loss.

A critical inconsistency arises in the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is necessary only if significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence provided. The assessment lacks sufficient evidence to conclude that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore,

the importance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly regarding species facing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in the context of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which inhibits the ability to lawfully conclude in favour of consent.

Moreover, the deficiencies identified indicate a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these issues render the assessment unreliable, characterised by internal inconsistencies, methodological shortcomings, and inadequate evidence. These failures hinder a thorough evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is severely lacking, neglecting the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application approaches heritage in a simplistic manner, perceiving it as a collection of disconnected, unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment inaccurately categorises them as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to a partial understanding of cultural effects, disregarding the essential role these sites play in community life.

Additionally, the evaluation fails to consider intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the

community and the coastal environment. These aspects are crucial to the identity of the area yet are completely excluded from the assessment, marking a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the proposed development.

Concerns regarding community rights and engagement are also prominent. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and does not adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

Moreover, a critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement as outlined in the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy expectations.

Overall, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application falls short of providing a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. While the developer engaged with local residents through focus groups, the full report remains unpublished, creating a crucial evidential gap. This absence of information obstructs both public understanding and the competent authority's ability to gauge the extent of social risks identified through the developer's research.

Preliminary summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These issues stem from direct community engagement and are not based on speculation. Nonetheless, the withholding of the complete assessment restricts thorough scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there is recognition that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the appropriate consideration. By not disclosing the entire Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency also undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health implications is crucial for developments of this scale. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and potential harm by omitting the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes while minimising harm, yet the available evidence highlights existing adverse effects that remain inadequately disclosed. Without access to the full assessment, demonstrating adherence to this policy is not feasible.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation hampers a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking, failing to capture the true extent of the changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline is defined by its open view of the Atlantic and its undeveloped, remote nature. The proposed large-scale turbines would intrude upon this landscape, establishing an industrial presence that would irrevocably alter its character and result in a permanent transformation.

Furthermore, the evaluation does not accurately depict the magnitude of the visual alterations that would occur. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic locations, and popular coastal spots. This dominance would have a detrimental effect on visual amenity and diminish the essential qualities of naturalness and remoteness that define this area. The assessment's failure to adequately address the significance of these impacts in such a sensitive landscape is concerning.

Methodological flaws have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not fully represent the most sensitive receptors or the most severe scenarios, especially concerning critical cultural heritage sites and valued landscapes. This oversight raises the possibility that the true scale of the visual impact has been underestimated, calling into question the reliability of the assessment's findings.

Additionally, the assessment does not adequately consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these assets as isolated entities neglects their interdependence, resulting in an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context within which heritage sites are appreciated and breaking their link to the natural horizon. This represents not only a visual impact but also a cultural and spatial harm that the application has not sufficiently addressed.

From a policy standpoint, the proposal contradicts the guidelines outlined in the National Planning Framework 4, particularly regarding the protection of natural landscapes and heritage sites. The extent of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further compromises the proposal's compliance with established policy.

It is evident that the impacts highlighted cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in fundamental and permanent changes that cannot be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the absence of comprehensive assessment regarding construction and pollution risks. It involves significant seabed preparation and installation activities in a challenging Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be established after consent, hindering any effective evaluation of their sufficiency or reliability.

This reliance on undefined future measures is particularly alarming given the sensitivity of the West Lewis coastline, which supports clean coastal waters and critical habitats susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer adequate detail on the preventive, control, or monitoring strategies that will be employed.

Furthermore, there is considerable uncertainty concerning the scale and dynamics of sediment plumes generated from seabed disturbances and cable installations. Without robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is further compounded by potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application undermines the ability to determine whether suitable safeguards are in place to address pollution events. This not only introduces procedural risk but also diminishes the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be reviewed prior to consent, and the absence of such critical information obstructs a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts create a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

impacts on fisheries and the livelihoods of those dependent on them remain unclear.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally deficient, failing to recognise the comprehensive impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are closely interconnected; however, their assessment is conducted in isolation. This fragmented approach obscures the overall environmental and socio-economic ramifications.

Included within the onshore works are the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of necessary access infrastructure through sensitive landscapes. These activities require excavation across areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The

application lacks a thorough assessment of these impacts, thus inhibiting a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an accurate assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project should be considered collectively. The division of offshore and onshore components results in an incomplete understanding of the combined effects on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated, nor does it indicate that effective avoidance measures have been implemented. This results in a notable evidential gap concerning biodiversity protection.

Concerns are also raised about the project's carbon balance. Disturbances to peatland can lead to the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter and fails to confirm that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure across active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or procedures have been initiated, which raises doubts about the project's deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes 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 identity of the area and the potential for emerging tourism sectors, such as astro-tourism, this omission in the Environmental Impact

Assessment is particularly concerning.

Moreover, the absence of an evaluation of impacts on nocturnal wildlife is critical. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, resulting in a failure to evaluate how aviation lighting could adversely affect these species and potentially increase their mortality rates.

This lack of assessment is exacerbated by the reliance on daytime survey data in the ornithological evaluation, which overlooks nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk has not been addressed. The failure to provide site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposed development.

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

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader evaluation of landscape and seascape impacts, given that the character of night-time environments is a vital aspect of the overall ecosystem.

In summary, 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 insufficient for supporting a lawful determination.

TOURISM

The significant growth of tourism on the Isle of Lewis, which surged from £65 million in 2017 to over £81.5 million, is critical for local employment and the economy. This sector supports more than 1,000 jobs and accounts for up to 16% of the island's economic landscape. However, the application fails to adequately assess the economic and social consequences that large-scale offshore infrastructure would have on this essential aspect of the community.

Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, there is no quantified assessment of how such infrastructure might influence visitor numbers, behaviour, or the overall economic contributions of tourism. The potential industrialisation of the seascape and the resulting degradation of environmental quality pose a serious risk to the sector's viability. The omission of a

thorough evaluation of Tourism Gross Value Added and the broader economic resilience raises significant concerns about whether the proposed development would provide a net benefit or inadvertently harm a vital and thriving sector.

Moreover, the assessment does not address the crucial role that environmental quality plays in attracting tourists, particularly the appeal of unspoiled landscapes and dark skies. This oversight not only neglects the visitor experience but also overlooks burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment leaves a critical void in understanding the potential impacts on these growing elements of the local economy.

In an island community with limited economic diversification, the lack of a thorough assessment of tourism impacts has far-reaching implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependence creates a significant evidential gap. This gap hinders a robust evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The 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.

Additional Comments

Not only do I believe this windfarm scale and closeness to Lewis to be wholly inappropriate, I find it difficult to believe that only this option is considered the best suggestion to produce energy. Furthermore, the islands and its people do not benefit in any substantial way, especially considering the amount of profits that the windfarm owners and shareholders are expected to make over the windfarm's lifespan.

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: 6804307C

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 in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental consideration, cultural impact, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not furnish an adequate evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain unspecified. The application's flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their efficacy unassessable. Consequently, the documents fail to provide a comprehensive or informed insight into the environmental, cultural, or community implications, and claims of negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with policy. The proposal appears to diverge from 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 obligations to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability from a policy perspective.

The magnitude of the proposal is unprecedented for this area, with large turbines situated in close proximity to the shore, raising significant issues related to landscape capacity, visual dominance, and environmental ramifications. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and fails to support a lawful determination. In light of these concerns, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a transparent or reliable account of the potential environmental effects of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hampers the ability to consistently apply a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts described may not accurately represent the actual development, which hinders both public understanding and the competent authority's evaluation of the true environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated later prevents a thorough evaluation of effectiveness and residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which requires likely significant effects and mitigation to be established before determination.

There are also substantial evidential gaps, including missing baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot meet statutory requirements.

Consequently, the application does not satisfy the evidential standards 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. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it fails to show that impacts have been fully assessed or that proper safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These issues impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. It does not provide a structured and reasoned comparison of realistic alternatives based on environmental impacts. Instead, it presents a narrative of the project's evolution, which does not sufficiently demonstrate that less harmful options have been identified,

assessed, and selected over more damaging solutions.

Additionally, there is a lack of transparent, evidence-based comparison for alternative offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has thoroughly considered the option of placing turbines further offshore, where the potential for visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in evaluating impact, the lack of such analysis leaves it unclear whether the proposed siting is indeed the least damaging option available.

These shortcomings also extend to the assessment of cable routing and landfall. There is insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, which includes culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been adequately employed, relying instead on post-design measures that do not ensure environmental harm is minimised through effective site selection, layout, and infrastructure routing.

This failure to follow the established mitigation hierarchy means the competent authority cannot ascertain whether more suitable, less harmful alternatives are available. Moreover, from a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, especially in terms of safeguarding natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that ultimately leads to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the application is significantly flawed, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is insufficient, and the applied methodologies do not adequately capture key factors such as species presence, behaviour, and habitat use. Consequently, the assessment falls short of providing a solid evidential foundation necessary for impact evaluation.

One major shortcoming is the failure to appropriately assess otters, a European Protected Species, in their use of coastal regions for foraging and movement. The application neglects to account for their core foraging range and behavioural characteristics, which results in a lack of thorough evaluation regarding the potential impacts of construction disturbances, noise, and increased human activity. This oversight directly undermines any assertions made about the absence of significant effects on otters.

Further issues arise in the analysis of basking sharks, where reliance on aerial surveys

creates a substantial detection bias, especially under Atlantic conditions. This method is likely to result in an underestimation of their presence, particularly when juxtaposed with established land-based observations that highlight their frequent activity in these waters. The failure to adequately incorporate or consider this data results in an incomplete baseline, thereby diminishing the reliability of the assessment's conclusions.

These methodological shortcomings mean that assertions regarding negligible or non-significant effects are based on unsubstantiated assumptions rather than on sound evidence. The lack of adequate baseline data also hampers the assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

Regulatory compliance is also in question, as the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainty generated precludes the exclusion of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Therefore, under these circumstances, granting consent is not legally permissible.

In conclusion, the presence of incomplete baseline data, inadequate methodologies, and unfounded conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a sufficiently solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment's internal inconsistencies and methodological weaknesses render it highly unreliable. It lacks sufficient evidence to conclude that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will remain unaffected. The reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species in severe decline, such as Kittiwakes and Fulmars. Moreover, the methodologies applied are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The development is sited within key foraging areas and migratory pathways. This placement creates a significant risk, as it establishes a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of potential sustained mortality in this corridor, nor does it adequately consider the effects on species with relatively small global populations.

A critical contradiction exists within the application itself. The developer states that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which is only necessary when significant harm is

anticipated. This inconsistency raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided.

From a regulatory standpoint, the application fails to meet the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data deficiencies, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been achieved. This failure engages the precautionary principle, obstructing a lawful conclusion in support of consent.

The application does not effectively demonstrate that the development will not adversely affect seabird populations already in decline. This inability places the proposal in direct conflict with national policy, specifically regarding biodiversity protection and the safeguarding of natural assets, as outlined in National Planning Framework 4.

Overall, the significant gaps in evidence and the lack of a robust evaluation of potential impacts lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, failing to recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are interconnected. The application employs a simplistic approach, viewing heritage as separate, unchanging assets instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment characterises them merely as static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and neglects their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the longstanding connection between the community and its coastal environment. These aspects are vital to the area's identity but are completely omitted from the evaluation, representing a significant gap. Understanding the cultural impact of the development is impossible without considering these elements.

Additional concerns arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent.

The lack of meaningful engagement raises questions about the validity of the assessment and fails to align with established principles regarding participation in matters affecting cultural and environmental interests.

There is also a critical procedural shortcoming in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone hampers lawful decision-making.

From a policy standpoint, these deficiencies directly contradict the National Planning Framework 4, particularly concerning the protection of historic sites and places. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise living cultural practices, indicates a clear divergence from policy standards.

When considered collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application fails to provide a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and

functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts on the seascape, landscape, and environment is inadequate. It does not properly reflect the sensitivity of the surroundings or the scale of change that would occur. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The proposal does not accurately depict the extent of visual change that would take place. The size and location of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would negatively affect visual amenity and diminish the qualities that define naturalness and remoteness. The assessment fails to communicate the significance of this impact within the context of such a sensitive landscape.

Concerns exist regarding the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This possibility raises doubts about the accuracy of the assessed visual impacts, suggesting they may be understated.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape with visual and spatial relationships to the Atlantic horizon. Instead of recognizing their interdependence, the

assessment treats these sites in isolation, leading to an incomplete evaluation of their impacts and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are experienced and disconnecting them from the natural horizon. This issue represents not just a visual impact but also a more profound cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal contradicts the National Planning Framework 4, which aims to protect natural places and historic assets. The anticipated changes do not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further calls into question compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting changes are fundamental and permanent and cannot be sufficiently reduced to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately reflect the impact scale, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks within the application is notably incomplete, failing to provide the necessary detail for evaluating potential environmental effects. Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that would be formulated after consent, which undermines the ability to meaningfully assess their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming 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 acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been

recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the assessment of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is in conflict with the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to consent; without such information, a lawful determination cannot be achieved. The application additionally fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally deficient. These shortcomings inhibit a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the

assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

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

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

Overall, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These issues 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 fails to account for the full range of impacts from what is essentially one integrated project. The offshore turbines and the onshore works are interconnected, but they are evaluated separately, which results in a disjointed approach that obscures the true extent of environmental and socio-economic consequences.

Among the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, especially in Barvas Moor, which is an important carbon store and ecologically sensitive area. The application does not adequately assess these impacts, hindering a comprehensive understanding of the project's total environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered collectively; however, the division between offshore and onshore elements means the combined effects on peatlands, habitats, and communities remain poorly understood.

Furthermore, there are notable risks to sensitive habitats, such as machair systems and peatland environments that enjoy policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken. This results in a significant gap in the evidence related to biodiversity protection.

Concerns regarding carbon balance are also prominent. Disturbing peatland releases

stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land presents possible conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been pursued, which raises doubts about the feasibility and lawful execution of the proposal.

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

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Critical gaps in baseline data render the evidential basis for determination incomplete and unreliable. The application relies on an undefined design envelope and unspecified mitigation measures, and it fails to address key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment represents a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal is in direct conflict with National Planning Framework 4, as it fails to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

All I can say is how can you even contemplate ruining the environment in this way. Lewis is the most amazing ecology and coastline and this will be detrimental to all that lives there.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F2BBE1A8

