

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its accompanying documentation has revealed serious deficiencies in material planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, proximity, and scale of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There is a critical absence of environmental data, while the baseline information provided is both limited and inconsistent. Important aspects of the proposal are still undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal presents clear and substantial conflicts with established policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The scale of the proposal is unprecedented for this location, with large turbines positioned very close to the shoreline, raising serious concerns related to landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and does not support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are significant, rendering it unreliable and incomplete. Notably, the assessment relies on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This ambiguity introduces considerable uncertainty and hinders a consistent application of a worst-case scenario. Consequently, the impacts reported may not accurately represent the development that will ultimately be constructed, leading to a failure in understanding the true environmental effects for both the public and the competent authority.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. This approach seeks consent under the premise that environmental harm will be addressed post-consent, which obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. The postponement of vital information to later stages is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly outlined prior to determination.

Moreover, the report exhibits critical evidential deficiencies, including substantial gaps in baseline data and limitations in methodology, relying excessively on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are put forth without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory requirements.

Furthermore, the proposal does not meet the evidential threshold outlined under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. It also does not demonstrate compliance with National Planning Framework 4, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of an undefined design envelope, unspecified mitigation strategies, and significant gaps in baseline data culminates in an Environmental Impact Assessment Report that lacks reliability and completeness. These inadequacies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, failing to offer a comprehensive and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture

the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation for evaluating potential impacts.

A notable oversight concerns otters, a European Protected Species, where the application inadequately acknowledges and evaluates their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential impacts resulting from construction disturbance, noise, and increased activity. This gap significantly undermines the conclusions regarding the absence of substantial effects on this species.

Additionally, the assessment of basking sharks reveals further shortcomings, as the reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence when compared with established land-based observations that indicate a frequent use of these waters. The omission of such relevant data results in an incomplete baseline, thereby compromising the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of sufficient baseline data also impedes a meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This lack of clarity creates uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential basis.

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 assessment of cultural heritage along the West Lewis coastline is insufficient. It does not recognise this area as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application treats heritage as a collection of static assets, overlooking their social, cultural, and spiritual roles in the community.

Significant shortcomings are evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance. However, the assessment mischaracterises them as unchanging features, neglecting their ongoing use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, ignoring their vital place in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the area's identity. The lack of consideration for these elements represents a major gap in the assessment, making it impossible to fully grasp the cultural impact of the proposed development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples. Despite this, the process of Free, Prior and Informed Consent has not been carried out. This lack of engagement undermines the assessment's validity and does not align with principles of participation concerning cultural and environmental matters.

Additionally, a significant procedural error is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately assess the social, cultural, and economic effects on the island community. This oversight alone renders the determination unlawful.

From a policy standpoint, these inadequacies contradict National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from required policies.

Overall, the lack of consideration for living heritage, intangible cultural significance, community rights, and statutory responsibilities leads to a critical evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, failing to provide a reliable basis 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 features an open Atlantic horizon and an undeveloped character that embodies a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally altering the landscape and causing a permanent transformation. The assessment of seascape, landscape, and visual impacts is deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately represent the extent of the visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The

significance of this impact has not been properly conveyed, particularly considering the sensitivity of the landscape.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the adequacy of the assessment of construction and pollution risks, which remains incomplete and lacks the necessary detail for evaluating the potential environmental effects. With substantial seabed preparation and installation works taking place in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is particularly troubling. The application appears to depend on the preparation of mitigation and contingency measures post-consent, which inhibits any meaningful assessment of their efficacy.

This reliance on undefined future measures is especially alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical 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 fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards will be in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to granting consent; absent this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application for development lacks a thorough assessment of its effects on fisheries and marine ecosystems, which presents significant risks to both ecological and socio-economic aspects. The waters off the West Lewis coast are home to a diverse marine life and an established fishing industry. However, the proposal does not convincingly demonstrate that these important resources can be safeguarded from substantial disruption.

A notable concern is the presumption that fishing activities can be easily relocated without negative repercussions. There is no evidence presented that alternative fishing

grounds exist or that they are accessible for use, which could support additional pressure on those areas. This gap is critical, as the potential for overfishing in alternative locations poses wider economic risks to the local fishing fleet. The absence of a clear, evidence-backed assessment means that the consequences for fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal carries significant risks for marine species, especially due to the underwater noise produced during construction. The anticipated extended hammer piling is expected to cause disturbances over large areas, impacting species such as dolphins. The projected disturbance of a large segment of the local bottlenose dolphin population is alarming; however, the application minimizes these effects without adequate supporting evidence.

Inconsistencies are also evident within the application itself. While it acknowledges the requirement for licenses to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to a degree necessitating legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts resulting from various pressures like habitat disruption, noise, and the displacement of fishing activities. Without a thorough examination of these combined factors, it is impossible to assess the overall impact on marine ecosystems and socio-economic conditions accurately.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not indicate that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, which hinders any conclusion regarding the sustainability of the proposal.

In summary, the lack of supporting evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies all contribute to an incomplete and unreliable assessment. These shortcomings obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the assessment of onshore infrastructure, which is materially incomplete. The offshore turbines and onshore works are intrinsically linked and should be considered as a single integrated project. However, they are assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore elements of the project include cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated

access infrastructure through sensitive landscapes. These activities involve excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which prevents a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application restricts the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together. The separation of offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This creates a significant evidential gap in relation to biodiversity protection.

The proposal also raises important issues regarding carbon balance. The disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this matter or show that the overall carbon balance is beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposal, however, introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This change poses significant concerns for both residents and visitors, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the overall experience in the area.

Moreover, the application does not evaluate the impacts on nocturnal wildlife, specifically species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting due to phototaxis. This sensitivity can lead to disorientation and increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including possible increases in mortality, remain unexamined.

Compounding these concerns is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been assessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts of the proposal.

The lack of assessment regarding nocturnal impacts prevents a determination of whether protected species or designated sites could be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and obstructing a lawful determination.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Now, this new application is presented under a framework that more strongly emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis for determining this application. There are deficiencies in baseline data, an undefined design envelope is employed, and unspecified mitigation measures are relied upon. Key impact pathways concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects have not been addressed. Consequently, the Environmental Impact Assessment is inadequate and

fails to provide a clear understanding of the likely significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a comprehensive Social Impact Assessment represents a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

This proposal stands in direct contradiction to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that impacts on health and wellbeing are acceptable and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been thoroughly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

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

Thus, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is 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: 0D5B499A

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, revealing significant deficiencies related to planning, environmental impact, cultural considerations, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural heritage. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policies, and the principles of sustainable development due to its scale, proximity, and design.

A crucial issue is the inadequate evidential basis provided for a lawful assessment of the application. There are notable gaps in critical environmental data, while baseline information is both limited and inconsistent. Furthermore, important elements of the proposal remain undefined. The application employs a flexible design framework that hinders a clear comprehension of the potential significant effects, and it relies on unspecified mitigation measures, which precludes an evaluation of their effectiveness. Consequently, the documentation does not furnish a full or informed understanding of the impacts on environmental, cultural, or community aspects, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, the application presents clear and significant conflicts with established policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The proposal does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine whether the development is acceptable in policy terms.

The unprecedented scale of the proposal in this region, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of sustaining a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the potential environmental effects of the proposal. By employing a flexible Project Design Envelope without committing to defined turbine dimensions, layouts, or configurations, the application introduces significant uncertainty. This approach hinders the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the impacts reported may not accurately represent the actual development, which in turn prevents both the public and the competent authority from grasping the full extent of the environmental consequences.

Moreover, the application places considerable reliance on unspecified mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental damage will be managed at a later stage, there is a significant barrier to conducting a meaningful evaluation of the measures' effectiveness or assessing any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation strategies be clearly articulated before determination.

The report also suffers from substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application presents a significant inadequacy in the assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime. It offers a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method does not demonstrate that less harmful options have been adequately identified, assessed, and selected in favour of more damaging solutions.

A transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations is notably absent. Specifically, the application does not establish that the developer has seriously contemplated placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies further extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis suggests that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The assessment of marine ecology and protected species presents significant deficiencies, particularly concerning the understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a sound evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, classified as a European Protected Species, where the application does not adequately acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks reveals additional deficiencies, as reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations indicating frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thus generating uncertainty regarding the true scale of risk to marine species and habitats.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions compromises the reliability of the assessment. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation. In light of the uncertainty introduced, it cannot be reasonably concluded that adverse effects can be excluded beyond reasonable scientific doubt, thereby engaging the precautionary principle and indicating that consent cannot be lawfully granted.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application proposes a development that fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are intrinsically connected. The evaluation adopts a reductive view of heritage, treating it as isolated and static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency in the assessment is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are categorised as static features, overlooking their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their essential role in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the assessment, representing a considerable omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the validity of the assessment and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure in the application is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

From a policy perspective, these deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear deviation from policy requirements.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not adequately convey the magnitude of the visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Methodological concerns arise regarding the selection and presentation of visual viewpoints, which 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 possibility that the visual impact has been understated, diminishing the assessment's reliability.

Another significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation 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 experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently assessed. From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of policy compliance.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents an incomplete assessment of construction and pollution risks, lacking the detail necessary to evaluate potential environmental effects. It entails extensive seabed preparation and installation works in a high-energy Atlantic environment but does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent is granted, which hampers a meaningful assessment of their adequacy and effectiveness.

This 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 vital habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail 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 that may arise from the 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 encompasses potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before granting consent, and the absence of this information means a lawful determination cannot be achieved. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts make the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

TOURISM

The application demonstrates a critical deficiency in assessing tourism impacts, which is vital for a significant sector of the Isle of Lewis economy. The region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential to attracting visitors. It is noted that 86% of tourists are motivated by the scenery, yet the application lacks a quantified assessment of how the proposed large-scale offshore infrastructure may influence visitor numbers, behaviours, or their overall economic contributions.

Tourism is not just a mere attraction; it has seen significant growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. This absence of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the critical role environmental quality plays in tourism. Unspoiled landscapes and dark skies enhance visitor experiences and are increasingly important to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a

substantial gap in understanding the repercussions on a recognised and burgeoning component of the local economy.

In an island community with limited economic diversification, neglecting the impacts on tourism carries wider implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to prove alignment with the National Planning Framework 4, particularly regarding economic impact and the essential demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide the competent authority with adequate evidence to evaluate the economic ramifications of the proposal.

In conclusion, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and recognise the island's economic dependence results in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the 2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination reveals that the application does not present a comprehensive or reliable evidential basis for evaluation. There are significant gaps in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures further complicates the assessment. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As such, the Environmental Impact Assessment is incomplete, failing to provide clarity on likely significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal contravenes National Planning Framework 4. It does not adequately safeguard biodiversity, natural places, and cultural heritage. The evidence

provided does not support that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

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

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

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

Additional Comments

Offshore wind turbines are often promoted as a clean energy solution, but they come with significant drawbacks that deserve closer scrutiny. The construction and maintenance of these massive structures can disrupt marine ecosystems, affecting fish populations, seabirds, and marine mammals through noise, vibration, and habitat alteration. Additionally, the visual impact on coastal landscapes can harm tourism and local heritage, particularly in areas known for natural beauty.

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: 3666E98E

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 objection arises from a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The development is proposed off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious concerns about its alignment with statutory obligations, national policy, and sustainable development principles.

The application does not establish an adequate evidential basis for a lawful decision. Critical environmental data is absent, baseline information is insufficient and inconsistent, and essential elements of the proposal remain unclear. The application employs a flexible design framework, which obscures a clear understanding of potentially significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory requirements for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shore, raises significant issues regarding landscape capacity, visual impact, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to reliably detail the expected environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hampers the ability to apply a worst-case scenario consistently, thereby undermining the assessment's integrity. Consequently, the impacts outlined may not accurately reflect the final development, which hinders both public and competent authority understanding of the actual environmental effects.

The application is significantly dependent on undefined mitigation measures, monitoring strategies, and management plans, which remain unestablished at this stage. As consent is being sought based on the premise that environmental harm will be addressed later, this prevents any substantive evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally inappropriate and conflicts with the fundamental aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly defined prior to determination.

Additionally, there are marked evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that the impacts have been thoroughly assessed or that sufficient safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and rigorous assessment of environmental effects, placing the competent authority in a position where it cannot responsibly determine the application based on the information that has been presented.

ASSESSMENT OF ALTERNATIVES

The proposed application lacks a thorough assessment of alternatives, failing to comply with the statutory requirements set by the Environmental Impact Assessment regime. It does not offer a well-structured or reasoned comparison of viable alternatives based on environmental impacts. Instead, the application presents a

narrative of the project's evolution, which inadequately demonstrates that less harmful options have been identified, assessed, and selected over more damaging solutions.

There is a noticeable absence of transparent and evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Crucially, the application does not show that the developer has genuinely considered placing turbines further offshore, where impacts on visual aspects, ecology, and coastal integrity would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in determining environmental impact, the lack of this analysis obstructs any conclusion that the proposed site is the least damaging option available.

This inadequacy also extends to the assessment of cable routing and landfall, where there is insufficient evidence showing that alternative routes have been adequately investigated to avoid or minimise impacts on sensitive areas. Such areas include culturally and spiritually significant locations like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis illustrate that mitigation by design has not been employed, with the focus instead placed on measures to mitigate impacts after the design phase.

Consequently, the application fails to prove that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This not only represents a disregard for the established mitigation hierarchy but also impedes the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. A robust assessment of alternatives is vital to determine whether the proposal can be regarded as sustainable or compliant with policy.

From a policy standpoint, this shortcoming detracts from adherence to the National Planning Framework 4, particularly in safeguarding natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant oversight, contributing to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging

range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to meet the required evidential standard to demonstrate that these seabird species will not be adversely affected. It is situated within key foraging areas and migratory pathways, yet does not adequately assess the implications of displacement, collision risk, or habitat loss for these vulnerable species.

A critical contradiction is evident, 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 concerns regarding the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence. The

assessment does not sufficiently demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately recognised, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional, significant risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. Furthermore, the application does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

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

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

In summary, the assessment is unreliable, marked by internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The assessment of cultural heritage and community identity within the application fails fundamentally, as it adopts a reductive approach by treating heritage as a collection of isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are merely characterised as static features within the assessment. This mischaracterisation ignores their ongoing use, significance, and the potential impact of development on their surrounding environments. Consequently, the evaluation of cultural effects remains incomplete, and the essential role these sites hold within community life is disregarded.

The assessment further fails to account for intangible cultural heritage, which includes vital components such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are central to the identity of the area, yet they are completely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinctive cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles regarding participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure exists in the absence of a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders lawful determination.

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

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application insufficient for evaluating the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete and transparent assessment of social impacts, health, and wellbeing, which is crucial for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This creates a significant evidential gap, hindering the public and the competent authority from grasping the full extent of the social risks identified through the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These effects are based on direct engagement and are thus not speculative. Nonetheless, the failure to disclose the full assessment limits proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting the risk of "cultural loss." Despite acknowledging these impacts, they have not been sufficiently integrated into the main application or given the necessary weight. The withholding of the full Social Impact Assessment conceals the genuine human and social costs 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 magnitude, especially where community character and functioning may be compromised. By failing to provide the complete dataset, the application does not offer an adequate evidential foundation 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. Developments must promote positive health outcomes and mitigate harm, yet the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This obstructs a lawful determination and underscores that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate, failing to accurately reflect both the extent of change and the sensitivity of the environment in question. The West Lewis coastline is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines, located close to the shoreline, would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently convey the magnitude of visual change. The turbines' scale and proximity would dominate views from residential locations, historical sites, and popular coastal areas. This would have a direct effect on visual amenity, diminishing the core qualities of naturalness and remoteness. The assessment fails to adequately capture the significance of this impact, particularly given the sensitive nature of the landscape involved.

Methodological issues also arise concerning the choice and depiction of visual viewpoints. Evidence indicates that these viewpoints might not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and landscapes of high value. This oversight raises concerns that the magnitude of visual impact has been understated, consequently compromising the assessment's reliability.

Additionally, there is a failure to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment considers these sites in isolation rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these vital relationships, changing the context in which heritage assets are perceived and breaking their connection to the natural horizon. This represents not only a visual detriment but also a wider cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The anticipated scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further diminishes any assertions of policy adherence.

It is evident that the identified impacts cannot be mitigated effectively. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Thus, the resulting change is fundamental and permanent, rendering any potential for mitigation to an acceptable level unlikely.

Collectively, the assessment does not accurately depict the scale of the impact, the environment's sensitivity, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The application acknowledges the presence of risks such as sediment mobilisation and accidental chemical or oil spills; however, it lacks sufficient detail on preventative, control, or monitoring measures for these risks. The assessment of construction and pollution risks associated with the proposal is incomplete, failing to provide the necessary detail to evaluate the likely environmental effects adequately.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will be formulated post-consent, which undermines any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures raises significant concerns given the sensitivity of the receiving environment.

Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the ability to evaluate whether appropriate safeguards are in place to address pollution events. Such a deferral introduces procedural risk and undermines the capability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the failure to provide critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed before consent is granted; 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.

Overall, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings significantly hinder a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed development has not sufficiently assessed the implications for fisheries and marine life, leading to a lack of a thorough evaluation of ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats will be safeguarded against significant disruption.

One major concern is the presumption that fishing activities can be shifted without repercussions. The application lacks evidence regarding the availability and accessibility of alternative fishing grounds that could handle additional pressure. This

critical omission raises significant concerns, as displacing fishing activities may lead to overfishing in other areas, which could adversely affect the local fishing fleet's economic viability. The absence of a clear, evidence-based assessment means that the effects on fisheries and local livelihoods are not fully comprehended.

Furthermore, the proposal presents considerable risks to marine species, particularly through the underwater noise generated during construction. The anticipated use of high-energy hammer piling over an extended timeframe is likely to disrupt marine life over considerable distances, notably affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application tends to minimise the seriousness of these impacts without providing adequate evidence to support such conclusions.

There is also a troubling inconsistency in the application where it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction diminishes the reliability of the assessment and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm may require legal authorisation.

Additionally, the assessment does not adequately address the cumulative effects stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined impacts, it is impossible to determine the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to comply with the National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity, which hampers any assertion that the proposal embodies sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the assessment result in an incomplete and unreliable evaluation. These flaws obstruct a proper understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The elements of the onshore works comprise cabling across areas of protected moorland, the construction of a substation in proximity to Stornoway, and the

development of access infrastructure traversing sensitive landscapes. These activities entail excavation in regions of deep peat, particularly within Barvas Moor, recognised as a significant carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, which impedes a complete understanding of the environmental footprint of the project.

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

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

Concerns also arise regarding carbon balance, as disturbance of peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts renewable energy development objectives. The application inadequately addresses this critical issue or demonstrates that the overall carbon balance remains advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in

a continuous and intrusive "wall of light" across the western horizon. This change would fundamentally alter the night-time environment.

Furthermore, the application fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of residents and visitors. The significance of dark skies to the area's identity and the growth of tourism sectors like astro-tourism underscores the importance of addressing this issue. The absence of an assessment on these impacts leads to a notable deficiency in the overall landscape and environmental evaluation.

More critically, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, thereby failing to evaluate how aviation lighting might affect these species or heighten mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this oversight, as it does not account for nocturnal activity or associated risks. Additionally, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot support a lawful determination.

TOURISM

The analysis of tourism impacts is inadequate and does not assess the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of seclusion. While the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence

visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or adversely affect an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, including the value of unspoiled landscapes and dark skies for visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment worsens this shortcoming, creating a considerable gap in understanding the effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been analysed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that highlight tourism as a key growth sector, and it does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This hampers a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It mirrors the fundamental concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current application, while submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still does not adequately address these issues.

There are significant shortcomings in the evidential basis for the application. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, there are

omissions concerning key impact pathways, including effects on nocturnal wildlife, the complete onshore infrastructure, and potential tourism implications. As a result, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of likely significant effects or any residual impacts.

The application also presents clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a material omission. These deficiencies obstruct the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the directives of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The required evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

On every level, this is a bad idea. It is going to ruin a very special and unique island. A lot of small tourism business will suffer, due to the reduction in tourism.

There is no reason for them to be built so close to shore and people homes. There is evidence to say that the low frequency noise that can no be heard can cause severe health issues as much as 40 miles away, which would blanket the entire island.

It will devastate fishing grounds, that only a couple of years ago, the government was trying to protect under hpma's.

It will destroy a lot of sea birds and migratory bird populations.

Scotland already produces 200% of it's energy needs from renewables, so why build this, or any wind farms on this scale?

There is no argument for it. No long term benefit to the island, and not needed in Scotland. Why not build it closer to where needs the energy, or where the companies behind it are based?

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: CE1AFF16

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. The application is submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The wind farm is proposed to be located off the west side of the Isle of Lewis, which is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise regarding the application's compliance with statutory requirements, national policy, and sustainable development principles. It lacks an adequate evidential basis for a lawful determination. There are critical environmental data gaps, with baseline information being both limited and inconsistent. Additionally, key aspects of the proposal are not clearly defined. The flexible design framework used complicates the assessment of likely significant effects, and the proposed mitigation measures have not yet been specified, making it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

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

The scale of this proposal is unprecedented for the area. The large turbines are planned to be positioned close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to reliably account for the potential environmental effects of the

proposal. The flexibility allowed by the Project Design Envelope, which does not commit to specific turbine dimensions or layouts, introduces considerable uncertainty. This creates challenges in applying a worst-case scenario consistently, thereby undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority unable to understand the true extent of the environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the assumption that environmental harm will be managed later does not allow for a proper evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly identified before any determination is made.

Additionally, there are serious evidential deficiencies present, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the assessment concludes that effects are negligible or non-significant without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not comply with National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that the impacts have been fully assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, preventing the competent authority from making a determination based on the information submitted.

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 west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the development fails to convincingly demonstrate that these species will not be adversely affected, despite the crucial location within key foraging areas and migratory pathways. It does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss, resulting in significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions reached are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

The siting of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with small global populations considered.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the planning application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead of acknowledging these relationships, the application reduces heritage to a collection of isolated and static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

There is a notable inadequacy in the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active

places of burial and spiritual practice, yet the assessment dismisses them as mere static features, failing to take into account their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts and ignores the integral role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the long-standing connection between the community and the coastal environment. These elements are essential to the area's identity but are entirely overlooked, representing a serious gap in the assessment. The absence of these considerations means that the cultural implications of the development cannot be comprehensively grasped.

Concerns also arise regarding community rights and the process of engagement. The Gaelic-speaking population, which embodies distinct characteristics akin to those of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and does not align with recognised principles of participation in matters impacting cultural and environmental interests.

A significant procedural shortcoming is the failure to produce a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community. This deficiency alone renders the determination process unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, indicates a clear deviation from policy mandates.

When considered collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and legal requirements create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to furnish a sound basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application suffers from a significant lack of transparency regarding social impacts, health, and wellbeing, which undermines its validity. The developer has conducted a Social Impact Assessment that involved focus groups with local residents, but the complete report remains unpublished. This failure to disclose the full assessment creates a notable evidential gap, hindering both public understanding and the competent authority's ability to assess the identified social risks thoroughly.

Residents are already reporting measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts have been gathered through direct engagement and should not be dismissed as speculative. Nonetheless, the absence of the full assessment limits scrutiny of the findings, thereby affecting their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with the developer's own research highlighting the risk of "cultural loss." Despite this alarming insight, such impacts have not been adequately reflected in the main application, nor have they been afforded the weight they merit. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of openness further compromises the Environmental Impact Assessment process. A thorough understanding of 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 entire dataset leaves the application lacking 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 regarding health and wellbeing. It is essential for developments to foster positive health outcomes and avoid detrimental effects, yet the evidence presented indicates existing adverse impacts that remain unaddressed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are noteworthy. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission represents a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of adverse effects already being felt by the community, leaves the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped character. This development would create a dominant industrial presence that would fundamentally alter the area's existing character, resulting in a permanent transformation of the landscape that cannot be mitigated.

The assessment of seascape, landscape, and visual impacts is significantly deficient, failing to adequately convey the scale of visual change anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic

sites, and coastal locations frequently used by the public. This alteration would directly impact visual amenity and diminish the natural qualities that define the area. Furthermore, the assessment does not reflect the significance of these impacts in relation to the sensitive landscape.

Methodological issues are also apparent in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the assessment has underestimated the magnitude of visual impact, thereby compromising its reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. The current assessment treats these sites as isolated entities, failing to acknowledge their interdependence and thereby resulting in an incomplete evaluation of the impacts on their cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately assessed within the proposal.

From a policy standpoint, the proposed development conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment weakens any assertions of compliance with policy guidelines.

The impacts identified are clearly not capable of effective mitigation. Due to the height, scale, and proximity of the turbines, their presence would be unavoidable and dominant. Thus, the resulting change to the landscape is not merely significant; it is fundamental and permanent.

In conclusion, the assessment fails to accurately represent the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These deficiencies inhibit a reliable evaluation and affirm that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of clearly defined mitigation measures and detailed management plans significantly undermines the assessment of construction and pollution risks. This proposal necessitates substantial seabed preparation and installation works in a high-

energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The reliance on mitigation and contingency measures to be developed after consent raises serious concerns, as it hinders a meaningful evaluation of their adequacy and effectiveness.

Particularly troubling is the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring strategies.

There is significant 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 effects of these potential impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the critical point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with the requisite policies related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing 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 application fails to provide a comprehensive assessment of the onshore infrastructure, which is materially incomplete. It neglects to consider the full scope of impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically connected; however, their separate assessments lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Among the onshore components are cabling traversing protected moorland, the

construction of a substation in proximity to Stornoway, and associated access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, an area recognised for its ecological sensitivity and as a significant carbon store. The absence of a thorough evaluation of these impacts inhibits a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application hinders an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered in conjunction. However, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal also raises significant concerns regarding sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity protection.

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

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of substantiated 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 proposal introduces permanent red aviation lighting that will be visible over long distances, thereby creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration will fundamentally change the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that contribute significantly to the area's environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment lacks any evaluation of the impact of this lighting on visual amenity, landscape character, or the experience of both residents and

visitors. This omission is particularly concerning given the significance of dark skies to the local identity and the development of tourism sectors such as astro-tourism. Consequently, the failure to consider these impacts results in a notable gap in the overall landscape and environmental assessment.

Moreover, there is no assessment of the impacts on nocturnal wildlife, which is a critical oversight. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, as they can become disoriented and face increased risks of collision. The application does not provide a lighting impact assessment or a study on phototaxis, thus failing to consider how aviation lighting may affect these species or contribute to higher mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this omission, as it does not account for nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission is in conflict with National Planning Framework 4 regarding the protection of natural places and the quality of the environment. It also undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

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

TOURISM

The application presents a serious shortcoming in its evaluation of tourism impacts, crucial for understanding the economic and social implications for the Isle of Lewis. Tourism in this area is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a distinct sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment does not quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this key sector.

The tourism industry has seen remarkable growth, expanding from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of

the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the decline in environmental quality on Tourism Gross Value Added and broader economic resilience. This lack of analysis hampers the ability to ascertain whether the proposed development would provide a net economic benefit or pose a threat to an established and flourishing sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, leading to a substantial gap in understanding the effects on a vital and expanding segment of the local economy.

In a community where economic diversification is limited, the oversight in assessing tourism impacts has broader repercussions for employment, local enterprises, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated in accordance with the requirements outlined in the Islands (Scotland) Act 2018.

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

In summary, the combined failures to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and account for the island's economic dependence lead to a significant evidential gap. This undermines the possibility of a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding sustainable development, failing to meet the necessary statutory duties, national policy, and evidential standards. This application echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, as it presents an unacceptable level of industrialisation despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant shortcoming of the application is its lack of a complete and reliable evidential basis for determination. Key gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted impact pathways concerning nocturnal wildlife, full onshore infrastructure, and tourism effects compromise the integrity of the Environmental Impact Assessment. This inadequacy

prevents a comprehensive understanding of the potential significant effects or residual impacts of the proposal.

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide evidence of a 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 thoroughly assessed, obscuring potential impacts 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, along with internal inconsistencies, indicate that the necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

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

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

Additional Comments

It would be a blot on the landscape

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: 96516437

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. It is informed by a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, which reveals 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 rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the proposal in relation to compliance with statutory requirements, national policy, and sustainable development principles.

There is a lack of adequate evidential support for a lawful decision. Essential environmental data is absent, baseline information is sparse and inconsistent, and critical aspects of the proposal remain unclear. The application employs a flexible design framework that obscures a clear assessment of potential significant effects, while the unspecified nature of proposed mitigation measures means their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Moreover, the proposal presents clear and substantial conflicts with policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests for consent and compromise the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, featuring large turbines situated close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance underscores that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable evaluation of the likely environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hampers the ability to apply a worst-case scenario consistently. Such an approach undermines the integrity of the assessment, meaning that the impacts presented may not truly reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the actual extent of the environmental effects.

Furthermore, the application relies extensively on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Consent is sought on the premise that any environmental harm will be mitigated at a later stage. This deferral prevents any meaningful evaluation of the effectiveness of those measures and hinders the assessment of residual impacts. It is procedurally unacceptable to postpone key information until post-consent stages, as this contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

In addition to the above issues, there are notable evidential deficiencies within the assessment, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of 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, creating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to adequately assess impacts or ensure that appropriate safeguards are in place for biodiversity protection and environmental integrity.

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

ASSESSMENT OF ALTERNATIVES

The application presented fails to provide a proper assessment of alternatives, which is critical under the Environmental Impact Assessment regime. Instead of offering a

structured comparison of viable alternatives based on their environmental effects, it merely recounts the evolution of the project. This narrative does not demonstrate that less harmful options have been identified and evaluated in preference to more damaging solutions.

Furthermore, there is a lack of transparency and evidence in comparing alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts could be lessened. Considering the sensitivity of the West Lewis coastline, and the crucial role of proximity to shore in assessing impact, this oversight means it cannot be concluded that the proposed siting is the least damaging option.

The issues are also evident in the cable routing and landfall assessment, where insufficient evidence has been provided to show that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis imply that there has been no application of mitigation by design, relying instead on measures that would be implemented after the design phase.

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

From a policy standpoint, these deficiencies jeopardise adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission, contributing to the overall finding that the application has not been sufficiently assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors present in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet there exists a deficiency in the baseline data, and the methodologies employed inadequately address species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significantly, the assessment does not adequately acknowledge or evaluate the

presence of otters, which are classified as a European Protected Species. There is a failure to recognise their active utilisation of coastal regions for foraging and movement. This oversight, particularly concerning their core foraging range and behavioural patterns, results in a lack of thorough analysis regarding the potential impacts of construction activities, noise, and increased human presence, thereby undermining any claims of negligible effects on this species.

Moreover, the evaluation of basking sharks is similarly deficient, primarily due to the heavy reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodological choice is likely to lead to an underestimation of the species' presence, especially when compared to established land-based observations that indicate frequent usage of the waters in question. The failure to adequately incorporate or consider such data further compounds the inadequacies in the baseline assessment and diminishes the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on solid evidence. Additionally, the lack of adequate baseline data obstructs a meaningful analysis of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations outlined in the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced thereby prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions culminates in an unreliable assessment. These deficiencies inhibit a rigorous evaluation of impacts on marine ecology and protected species, culminating in the overall assertion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on the ornithological landscape of the Isle of Lewis. The assessment provided is fundamentally flawed, exhibiting considerable gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will remain unaffected, especially given that the development is situated within key foraging areas and migratory pathways. There is insufficient evaluation of the potential implications of displacement, collision risk, and habitat loss.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning community identity and cultural heritage is fundamentally insufficient, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive viewpoint, viewing heritage merely as a collection of isolated, static assets without recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of sites of cultural significance, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet the assessment misclassifies them as static features.

This oversight neglects their continued significance, meaning, and the consequences of development on their environment, resulting in an incomplete understanding of cultural impacts and disregarding their importance within community life.

Additionally, the application neglects intangible cultural heritage, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These components are vital to the area's identity but are not considered in the assessment, marking a significant oversight. The absence of these factors prevents a comprehensive understanding of the cultural impacts of the development.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, which has a distinct cultural identity and is recognised as Indigenous People, has not been afforded the Free, Prior and Informed Consent process. This lack of meaningful engagement diminishes the legitimacy of the assessment and fails to align with established principles regarding participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic implications for the island community, creating a barrier to lawful determination.

From a policy standpoint, these shortcomings position the proposal at odds with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, marks a clear deviation from policy requirements.

Collectively, these failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing poses significant challenges to the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the absence of the full report creates a substantial evidential gap. This omission limits both public understanding and the competent authority's ability to gauge the social risks identified in the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. Nevertheless, the

failure to disclose the complete assessment restricts proper scrutiny of these findings and hampers the assessment of their importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with indications of "cultural loss" noted within the developer's findings. Despite the gravity of these impacts, they have not been adequately incorporated into the primary application nor given the necessary weight. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be compromised. The application does not provide the complete dataset required to establish a thorough evidential basis for balancing benefits against harm.

From a policy perspective, the application does not illustrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications are substantial, as the competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views

from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

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

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

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

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

CONSTRUCTION AND POLLUTION RISKS

The current assessment of construction and pollution risks is inadequate, lacking the necessary detail for a proper evaluation of environmental effects. The proposal entails

significant seabed preparation and installation activities within a dynamic Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent, which prevents any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is especially alarming due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disruption and pollution. While the application recognises the risks of sediment mobilisation and potential chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a stage following consent, the application obstructs the evaluation of whether appropriate safeguards exist to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures during the determination process.

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

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

FISHERIES AND MARINE LIFE

The application proposes development that poses immediate and substantial risks to marine life and fisheries. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal lacks a thorough assessment of the ecological and socio-economic impacts, failing to demonstrate that these vital uses and habitats can be maintained without significant disruption.

A critical concern lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This significant omission raises the risk of overfishing in other areas and could have broader economic consequences for the local fishing fleet. Without a comprehensive and evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal introduces considerable risks to marine species, particularly due to underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause disturbances across large distances, affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects, lacking adequate supporting evidence.

There is also a troubling inconsistency within the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance 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 that it avoids unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that

traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

Additionally, by deferring or omitting the assessment of onshore impacts, the application undermines the capacity to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all project components be considered in conjunction, yet the current approach leads to a lack of understanding of the combined effects on peatlands, habitats, and local communities. The risks posed to sensitive habitats such as machair systems and peatland environments, which are protected by policy, remain unaddressed in the application. It does not convincingly demonstrate that thorough assessments of these habitats have been conducted or that suitable avoidance measures have been considered, revealing a significant evidential gap regarding biodiversity protection.

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

Moreover, the routing of infrastructure through active croft land raises conflicts with existing land use and legal rights. The application provides insufficient evidence that requisite consents or processes have been initiated, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated significantly undermines the application. Overall, the disjointed treatment of project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts result in an application that is incomplete and unreliable, thus impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of nocturnal wildlife and dark skies constitutes a serious flaw in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over vast distances, resulting in a persistent and intrusive "wall of light" that would drastically transform the night-time landscape.

The application fails to evaluate how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The neglect of these impacts highlights a substantial shortcoming in the overall assessment of landscape and environmental effects.

Moreover, there is no analysis of the consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly affected by artificial lighting due to their phototactic nature, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to investigate how aviation lighting might harm these species or raise mortality rates.

The situation is worsened by the use of daytime survey data in the ornithological assessment, which overlooks nocturnal activities and their associated dangers. For example, 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 significant gap in understanding the ecological impacts.

Without an evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to rule out negative impacts beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions are inconsistent with the National Planning Framework 4 concerning the safeguarding of natural areas and environmental quality. Furthermore, this neglect undermines the comprehensive evaluation of landscape and seascape effects, as the character of night-time environments is a crucial component of the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife represents a significant evidential void. The absence of baseline data, impact modelling, and species-specific examination makes the application incomplete and incapable of achieving a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having risen from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application fails to assess how large-scale offshore infrastructure would impact visitor numbers, behaviour, or the overall economic contribution of tourism, despite acknowledging that 86% of visitors are attracted by the area's scenery. The absence of a comprehensive

evaluation on how the industrialisation of the seascape and a decline in environmental quality would influence Tourism Gross Value Added or broader economic resilience raises concerns about potential negative repercussions on this vital sector.

Moreover, the assessment neglects the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies for enhancing visitor experiences and promoting emerging markets like nature-based tourism and astro-tourism. This gap is further exacerbated by the lack of a Dark Skies Assessment, which is crucial for understanding impacts on this recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that highlight tourism as a key growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This inadequacy hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm epitomises a significant shortfall in meeting the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This latest application, presented under a more robust policy framework, still fails to adequately address concerns regarding biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough evidential basis for this application is lacking. There are notable deficiencies in baseline data, the use of an ambiguous design envelope, unspecified mitigation measures, and the failure to address key impact pathways, such as nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island

Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These oversights hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the safeguarding of biodiversity, natural spaces, and cultural heritage, nor does it provide assurance that health and wellbeing impacts are acceptable. There is also a lack of evidence supporting a net economic benefit, as tourism impact modelling is absent. The failure to properly assess the cumulative impacts of both offshore and onshore components conceals the potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The incomplete assessments of marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively inadequate for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory measures to obtain the necessary information.

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

Additional Comments

It would be an act of vandalism to industrialise and destroy the unique character of this island, to sacrifice its natural beauty and culture that is an enduring asset for the UK.

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: 4791A72E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The application was submitted under the marine licensing and Environmental Impact Assessment regimes. After reviewing the Environmental Impact Assessment Report and the related documentation, this objection highlights several deficiencies in 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, nearly pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful determination. Key environmental data is absent, baseline information is inconsistent and limited, and important elements of the proposal remain undefined. The flexible design framework used in the application hampers a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by solid evidence.

There are notable policy inconsistencies present. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate concerns, and environmental integrity. Such conflicts impact the statutory tests necessary for consent and undermine the ability of the relevant authority to determine that the development aligns with policy standards.

The scale of this proposal is unprecedented in this area, with large turbines situated near the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and cannot support a lawful determination. In light of these concerns, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a comprehensive, transparent, and reliable account of the likely environmental effects. It employs a flexible Project Design Envelope without specific commitments to turbine dimensions, layouts, or configurations, introducing substantial uncertainty. This approach undermines the integrity of the assessment and obscures the true environmental impacts of the development, hindering both public understanding and the competent authority's ability to evaluate the implications accurately.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the premise that environmental harm will be managed later obstructs meaningful evaluation and assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are clearly established prior to determination.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These shortcomings create uncertainty concerning the scale and significance of impacts, especially in instances where conclusions of negligible or non-significant effects are posited without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to 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. The precautionary principle is particularly relevant regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially concerning biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an ambiguous design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects and leave the competent authority ill-equipped to make an informed determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a proper assessment of alternatives, which is not met in this application. It lacks a structured comparison of realistic alternatives based on their environmental effects. Instead, the application provides a narrative of the project's evolution, failing to show that less harmful options

have been identified and selected over more damaging ones.

There is also no clear or evidence-based comparison of different offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious thought to positioning turbines further offshore, where the visual, ecological, and coastal impacts may be lessened. The sensitivity of the West Lewis coastline highlights the importance of proximity to shore in assessing impact. Without this analysis, it is impossible to determine that the proposed siting is the least damaging option.

The issues extend to the assessment of cable routing and landfall, where there is a lack of sufficient evidence that alternative routes have been thoroughly considered to minimise impacts on sensitive areas. This includes culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been pursued, relying instead on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through choices in site selection, layout, and infrastructure routing. This oversight contravenes the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether better alternatives exist. A thorough assessment of alternatives is essential to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these shortcomings undermine adherence to National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not undergone sufficient assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This marine system is both sensitive and biologically active. However, the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

Among the notable omissions is the failure to properly recognise and assess the presence of otters, which are a European Protected Species. The application overlooks their active use of coastal areas for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. This oversight means that the possible impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated, thus undermining any claims regarding the lack of significant

effects on this species.

Additionally, the assessment of basking sharks is inadequate, relying on aerial surveys that introduce significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate their frequent use of these waters. The failure to incorporate relevant data weakens the reliability of the conclusions drawn and contributes to an incomplete baseline.

These methodological weaknesses lead to conclusions about negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, consent cannot be legally granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents numerous deficiencies that fundamentally undermine its reliability. There are significant gaps in evidence and inconsistencies within the findings that call into question the conclusions drawn. The location of the development within crucial foraging areas and migratory pathways for seabirds, particularly on the west coast of the Isle of Lewis, raises concerns, especially given that these populations are already experiencing decline. The application fails to adequately demonstrate that these internationally important species will not face adverse effects, particularly in light of potential habitat loss, displacement, and collision risks.

A critical contradiction arises from the developer's assertion of no significant adverse effects, while simultaneously submitting a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the validity of the assessment, indicating that the conclusions are not underpinned by sufficient evidence. Furthermore, there is a lack of robust evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The essential feeding grounds for these birds have not been fully

acknowledged, and the reliance on modelling methods introduces considerable uncertainty, especially for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, particularly when baseline data is incomplete and the behavioural responses of species are not comprehensively understood.

Moreover, the placement of turbines within a known migratory corridor adds an additional layer of risk. This development effectively creates a barrier within a primary flight path that is critical for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently explore the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory standards are also not met, as the application fails to provide the necessary evidential threshold to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, data gaps, and modelling shortcomings indicates that the standard of beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and thereby hindering a lawful conclusion in favour of consent.

Overall, these identified shortcomings reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected positions the proposal at odds with national policy. Collectively, these factors render the assessment unreliable, as the internal inconsistencies, methodological flaws, and insufficient evidence hinder a thorough evaluation of potential impacts and contribute to the conclusion that the application does not fulfil the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal has significant shortcomings in its assessment of cultural heritage and community identity. It overlooks the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. Instead, the application takes a narrow view, treating heritage as a collection of separate and static assets. This approach fails to recognise the ongoing social, cultural, and spiritual roles these assets play in the community.

One major issue is the evaluation of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual significance, yet they are classified as static features in the assessment. This mischaracterisation ignores their current use and the impact of proposed development on their surroundings, leading to an incomplete understanding of cultural effects and neglecting their importance in community life.

Additionally, the application does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it acknowledge the long-standing

relationship between the community and its coastal environment. These factors are crucial to the area's identity but are completely absent from the assessment, which is a notable oversight. Without this context, the cultural implications of the development cannot be comprehensively evaluated.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not comply with recognised principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortfall 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 consider the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These issues also conflict with policy requirements, particularly those outlined in the National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to account for both tangible and intangible heritage and to acknowledge living cultural practices marks a clear deviation from policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application lacks a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is inadequate and lacks the necessary transparency for a lawful evaluation. While the developer engaged local residents through a commissioned Social Impact Assessment and focus groups, the full report remains unpublished. This omission creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks highlighted by the developer's research.

Moreover, available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement, not speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings adequately or ascertain their significance within the decision-making framework.

There are also indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" mentioned in the developer's own findings. Despite the recognition of these impacts, they have not been sufficiently integrated into

the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be adversely affected. The failure to provide the complete dataset means the application does not present a comprehensive evidential basis for weighing benefits against harm.

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

The procedural implications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential standards of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic views, undeveloped nature, and pronounced remoteness. The introduction of large-scale turbines near the shoreline would create an unbroken and prominent industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

Moreover, the application does not fully portray the magnitude of this visual change. Given the size and proximity of the turbines, they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its importance within the context of such a delicate landscape.

There are also serious methodological issues regarding the choice and presentation of 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 valued landscapes. This raises the possibility

that the extent of visual impact has been underestimated, thereby compromising the reliability of the assessment.

Another significant shortcoming is the lack of consideration for 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 that is visually and spatially linked to the Atlantic horizon. The assessment regards these as separate entities rather than acknowledging their interconnections, leading to an incomplete appraisal of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which pertains to the protection of natural environments and historic assets. The scale of proposed changes is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy adherence.

It is evident that the impacts identified 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, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately depict the impact scale, the environment's sensitivity, or the interdependent nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment, but it lacks the necessary detail to assess potential environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, and it relies heavily on mitigation and contingency measures that would only be prepared after consent. This approach is particularly concerning given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination.

The application acknowledges various risks, including sediment mobilisation and potential chemical or oil spills, yet it provides insufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed

disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological effects of such impacts, raising concerns about their implications for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders an assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards conflicts with the stipulations of the Environmental Impact Assessment regime, which requires an assessment of likely significant effects and mitigation measures prior to granting consent. The absence of crucial information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings of not having defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and onshore works as part of a single integrated project is fundamentally flawed, as it neglects to consider the full range of impacts. The onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are inextricably linked to the offshore components. However, by assessing these elements separately, the application presents a disjointed view that obscures the overall environmental and socio-economic consequences of the project.

The proposed infrastructure involves excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The failure to comprehensively assess these impacts leads to an incomplete understanding of the project's environmental footprint. Furthermore, by excluding or deferring the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are considered collectively, but the current separation results in an inadequate understanding of the combined impacts on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application lacks evidence that the potential impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place, indicating a

significant gap in biodiversity protection.

Concerns regarding carbon balance are also pertinent, as the disturbance of peatland may release stored carbon, thereby potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this aspect or demonstrate that the overall carbon balance is indeed beneficial.

The routing of the infrastructure through active croft land raises further issues, potentially conflicting with existing land use and legal rights. There is no evidence that the necessary consents or processes have been initiated, which raises questions about the project's deliverability and lawful execution.

From a policy standpoint, the disjointed assessment and failure to demonstrate protection of peatlands, habitats, and land use interests conflict with both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application.

In summary, the separation of project components, the lack of a comprehensive assessment, and the absence of substantiated evidence regarding environmental and land use impacts result in an incomplete and unreliable application, 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 potential. The proposed development introduces permanent red aviation lighting that would be visible over considerable distances, creating an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is significant, particularly as the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. The importance of preserving dark skies is underscored by the area's identity and the growth of tourism sectors such as astro-tourism.

Moreover, the Environmental Impact Assessment does not address the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the application overlooks the potential adverse effects of aviation lighting on these species, increasing their mortality risk.

The issue is further compounded by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated hazards. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting. This lack of site-specific night-time data highlights a critical gap in understanding the ecological impacts involved.

Without a thorough evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to exclude any adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural spaces and environmental integrity. They also undermine the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by the scenery. However, it lacks a quantified assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution. The evaluation of tourism impacts is therefore materially deficient, failing to address the economic and social consequences for this essential sector of the local economy.

Tourism on the Isle has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs while accounting for up to 16% of the island's economy. Nevertheless, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or broader economic resilience. The lack of such an analysis leaves open the question of whether the proposed development would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment fails to consider how environmental quality supports tourism. Unspoiled landscapes and dark skies are crucial to the visitor experience and to emerging markets, including nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, creating a significant gap in understanding the potential impacts on this recognised and growing aspect of the local economy.

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

From a policy standpoint, the application does not adequately demonstrate

compliance with the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency creates a substantial evidential gap. This ultimately hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding sustainable development and does not meet the necessary statutory duties. It mirrors the issues that caused the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more stringent policy framework that emphasises biodiversity and community wellbeing, it fails to provide a comprehensive evidential basis for assessment.

Critical gaps in baseline data and reliance on an undefined design envelope undermine the application. There are also unspecified mitigation measures and significant omissions, such as impacts on nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects and residual impacts.

Additionally, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment is a substantial omission. These issues prevent the competent authority from effectively evaluating impacts on community wellbeing and cultural identity, making the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to safeguard biodiversity, natural places, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, complicating assessments related to peatlands, carbon balance, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The application does not meet the evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle and

preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is essential for the competent authority to refuse consent for the Spiorad na Mara Offshore Wind Farm application or require the submission of the missing information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 62C3F8A7

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. A thorough review of the Environmental Impact Assessment Report and its supporting documentation has revealed substantial deficiencies across material planning, environmental, cultural, and procedural aspects. The site of the proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of this proposal raise significant concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

A lawful determination is not supported by the application, as it lacks an adequate evidential basis. There is a notable absence of critical environmental data, with limited and inconsistent baseline information. Furthermore, key elements of the proposal are undefined. The adoption of a flexible design framework hinders a clear understanding of the likely significant effects. Additionally, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not facilitate a full or informed understanding of the environmental, cultural, or community impacts involved. Claims regarding negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts 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 places, cultural heritage, and health and wellbeing. It has not satisfactorily demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impair the capacity of the competent authority to ascertain whether the development is acceptable within policy frameworks.

The unprecedented scale of the proposal raises serious concerns, as large turbines are set to be positioned in close proximity to the shoreline, thereby impacting landscape capacity, visual dominance, and overall environmental integrity. In light of the insufficient information presented, the reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete. This renders it incapable of supporting a lawful determination. Therefore, in these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

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

narrative detailing the evolution of the project. This method does not establish that less harmful options have been adequately identified, evaluated, and preferred over more damaging alternatives.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is both sensitive and biologically rich, yet the available baseline data is inadequate, and the methodologies employed do not sufficiently document species presence, behaviour, or habitat usage. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their use of coastal areas for

foraging and movement. The failure to evaluate their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been sufficiently examined. This gap undermines any assertions regarding a lack of significant effects on this species.

In addition, the assessment of basking sharks is problematic. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The failure to adequately incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions presented.

The limitations in methodology result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and broader ecosystem interactions. This situation raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development is fundamentally flawed, showing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. This development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

There is a clear contradiction within the application. The developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction raises concerns about the reliability of the assessment and suggests that its conclusions lack support from the evidence provided.

The assessment fails to supply sufficient evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully consider the significance of these feeding grounds, and the reliance on modelling approaches introduces a level of uncertainty, especially for species facing severe declines, like Kittiwakes and Fulmars. The methodologies used may underestimate mortality, particularly where baseline data is lacking and behavioural responses are not fully understood.

Additionally, the placement of turbines within a recognized migratory corridor presents a serious risk, potentially acting as a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor, as well as the possible effects on species with relatively small global populations, are not sufficiently assessed in the application.

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

Moreover, the deficiencies highlighted 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 this proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development lacks a robust assessment of cultural heritage and community identity, particularly in its failure to recognise the West Lewis coastline as a vibrant cultural landscape. This area is characterised by an intricate relationship between environment, language, tradition, and community. The application adopts a narrow perspective, viewing heritage merely as isolated and static assets, rather than acknowledging their active social, cultural, and spiritual significance within the community.

Central to the deficiencies identified are the culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment regards them as static features. This oversight neglects their ongoing use and meaning, as well as the implications of the proposed development on their setting, leading to an inadequate evaluation of cultural impacts and a disregard for their integral role in community life.

The assessment also fails to account for intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These vital elements are crucial to the identity of the area, but their absence from the assessment signifies a significant gap. Without integrating these aspects, the true cultural implications of the development remain obscured.

Moreover, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised for its unique cultural identity as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement raises questions about the legitimacy of the assessment and does not align with established principles regarding participation in decisions that impact cultural and environmental interests.

A notable procedural shortcoming is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this required assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic consequences for the island community. This gap alone hinders lawful decision-making.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, particularly regarding the preservation of historic assets and sites. The neglect to address both tangible and intangible heritage, alongside the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not offer a sufficient foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application demonstrates a significant deficiency in the assessment of social impacts, health, and wellbeing, 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 omission creates a considerable evidential gap, obstructing both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer's research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These adverse effects stem from direct engagement with the community and are not speculative in nature. However, the lack of disclosure regarding the full assessment hinders proper scrutiny of these findings and limits the

capacity to assess their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings acknowledging a "cultural loss." Despite this recognition, these 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 human and social costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for projects of this scale, especially where the character and functioning of the community may be at stake. The failure to present the full dataset means that the application does not provide a complete evidential basis for weighing the benefits against the harms.

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

The procedural ramifications are considerable. The competent authority is unable to carry out a comprehensive socio-economic and health evaluation without access to the entire 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 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 obstructs lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application does not adequately illustrate the magnitude of the anticipated visual change. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly

impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to adequately represent the level of this impact or its significance in relation to such a sensitive landscape.

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

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

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

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

Lastly, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and inescapable. Thus, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through any form of mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. The

application fails to provide a comprehensive assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application defers to mitigation and contingency measures that are to be established post-consent, which impedes any meaningful assessment of their adequacy or effectiveness.

The reliance on undefined future measures raises significant concerns, particularly in light of the sensitive nature of the receiving environment. While the application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, it does not adequately address how these risks will be prevented, controlled, or monitored. Moreover, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate measures are in place to respond to pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to granting consent, and the absence of such information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts associated with the proposed development. This deficiency raises serious concerns regarding the ability to protect and maintain these vital uses and habitats without significant disruption.

A critical flaw in the application is the assumption that fishing activity can be displaced

without negative consequences. There is no evidence presented to show that alternative fishing grounds are available or able to support additional pressure, making this omission particularly significant. The potential for displacement risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life over large distances, notably affecting species such as dolphins. Despite the serious implications for a significant portion of the local bottlenose dolphin population, the application minimizes these effects without adequate supporting evidence.

There exists an inconsistency within the application, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction casts doubt on the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where potential harm is anticipated to a degree requiring legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as 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.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies undermine the assessment's reliability. These shortcomings prevent a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of the onshore infrastructure, neglecting to consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interdependent; however, the separate evaluations lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Key components of the onshore development include cabling that crosses protected moorland, the construction of a substation located near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation

in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

By deferring or omitting the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; thus, the disjointed assessments of offshore and onshore elements prevent a full understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are recognised for their policy protection. The application does not adequately demonstrate that the impacts on these critical habitats have been thoroughly assessed or that effective avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal additionally raises serious concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently address this critical issue or provide evidence that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, raising doubts about the feasibility and legality of implementation.

From a policy standpoint, the project's fragmented assessment and the failure to safeguard peatlands, habitats, and land use interests are at odds 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.

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect on the western horizon. This change would fundamentally alter the night-time environment.

The application lacks a thorough evaluation of how this lighting might impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the area's identity and the growing tourism sector focused on astro-tourism. The absence of these considerations results in a notable deficiency in the overall landscape and environmental evaluation.

Moreover, there has been no assessment of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to the effects of artificial lighting due to phototaxis, which can result in disorientation and a heightened risk of collision. The application fails to include any form of lighting impact assessment or phototaxis study, neglecting to examine how aviation lighting may influence these species or contribute to increased mortality.

This lack of evaluation is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or its associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation due to artificial lighting, yet this potential hazard has not been assessed. The absence of site-specific night-time data creates a substantial void in understanding ecological impacts.

Without a comprehensive assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to eliminate 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 contradicts the National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

Overall, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of facilitating a lawful determination.

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

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

effects or residual impacts.

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

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

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

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

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

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

Additional Comments

I strongly object to the proposed N4 Spiorad Na Mara wind farm development. This will decimate our Islands' environment, affecting marine and land wildlife, the seabeds and surrounding land as well as the visual pollution these massive turbines will cause to the islands' outstanding natural beauty which is a massive draw for the tourism industry which is a cornerstone of our local economy. The infrastructure on the island is not fit to cope with the increased traffic, wear and tear of the additional plant and vehicles, the

flights and ferries to and from the island do not have enough capacity as it is to cope with the additional influx of workers, plant and vehicles either which would have a detrimental effect the capacity of these lifeline services for local people.

There are potentially serious health risks from infrasound disturbance which have not been accounted for in the environmental assessments for the project.

Apparently there will be no financial benefit to islanders on our energy prices as the energy companies have publicly rejected the proposal of zonal pricing (not just for this project but across the board).

There are so many proposed turbine projects around Scotland as separate initiatives, with no joined up thinking in terms of infrastructure planning, and due to grid capacity restraints existing turbines are often switched off. There was a call for a moratorium on new developments to review everything as a whole and create a national energy strategy but this sensible option has been rejected and these numerous large scale wind farm projects are being pushed ahead with seemingly no care or concern for the environment or the views and livelihoods of the locals who have to live with them.

The artists impressions of the turbines of N4 Spiorad Na Mara positioned around Lewis emphasise the HUGE scale of the turbines themselves and the development as a whole and make it look like the island is enclosed in a giant metal cage.

There are also the sustainability issues about the running of the turbines themselves- What happens to the turbines when they reach the end of their useful life? What about the oils and lubricants used to keep the wind turbines running?

All in all I can see zero benefit for our fragile Hebridean ecosystems, our health, our local infrastructure, our cost of living, lifeline services or our livelihoods from this project. Decimating the actual environment (not just in the Hebrides but all around Scotland) in the name of achieving 'sustainability' and 'renewable energy' is shamefully ironic.

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: BB63ACCE

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 marine licensing and Environmental Impact Assessment regulations. It is based on an analysis of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. This proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing shores, near-pristine environment, and rich cultural heritage. Concerns about the scale, design, and proximity of the project raise serious questions about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful decision. Important environmental data is absent, baseline information is sparse and inconsistent, and critical elements of the proposal remain unclear. The adoption of a flexible design framework inhibits a precise assessment of potential significant effects, while reliance on unspecified mitigation measures prevents evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects are not substantiated by adequate evidence.

There are evident and substantial conflicts with policy. The proposal does not seem to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not illustrate that it can satisfy national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies are critical to the statutory tests required for consent and weaken the ability of the competent authority to determine the development's acceptability according to policy.

The scale of this proposal is unprecedented for the region, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual impact, and environmental consequences. In summary, the combination of insufficient information, reliance on undefined mitigation measures, evidential gaps, and clear policy non-compliance indicates that the application is incomplete and cannot sustain a lawful decision. Therefore, the precautionary principle should be applied in this situation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intricately connected. However, the assessment of cultural heritage and community identity fails to acknowledge this dynamic relationship, treating heritage merely as isolated, static assets. This reductive approach neglects the ongoing social, cultural, and spiritual functions that these heritage sites perform within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries are active places of burial and spiritual practice; yet, they have been categorised as static features in the assessment. This mischaracterisation overlooks their continued use and meaning, as well as the potential impacts of development on their setting. Such an incomplete evaluation disregards their vital role in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language and local traditions, which are central to the area's identity. The absence of these elements signifies a considerable omission, preventing a thorough understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of an Indigenous People, yet the application lacks any process of Free, Prior and Informed Consent. This significant oversight undermines the legitimacy of the assessment and neglects established principles of meaningful participation in decisions that affect cultural and environmental interests.

Another critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this necessary assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, leading to a determination that is not lawful.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices represents a clear deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a solid 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 a significant concern and undermines the integrity of the evaluation process. The developer commissioned a Social Impact Assessment that involved focus

groups with local residents; however, the full report has not been made publicly available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks identified through the developer's own research.

Residents are reportedly experiencing tangible stress, anxiety, and concerns regarding the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not merely speculative. Nevertheless, the lack of access to the complete assessment limits the scrutiny of these findings and hampers the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The failure to release the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially in contexts where community character and function may be at stake. By not providing the complete dataset, the application fails to establish a thorough evidential basis for evaluating the balance of benefits and harms.

From a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm; however, the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural implications of these issues are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material deficiency in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual quality is significantly inadequate and does not sufficiently account for the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is

characterised by its unobstructed Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a continuous and dominant industrial feature, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

There is a clear lack of representation regarding the magnitude of visual change within the application. The considerable scale and close proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately convey the level of this impact or its significance, particularly within a landscape that is as sensitive as this one.

Methodological issues arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately reflect the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and landscapes of high value. This leads to the risk that the extent of visual impact has been understated, compromising the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape framework interconnected through visual and spatial relationships with the Atlantic horizon. The assessment regards these as isolated entities rather than acknowledging their interdependence, resulting in a fragmented understanding of the impacts on their settings and cultural importance.

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The magnitude of the proposed changes does not align with the necessity to protect landscape character, visual amenity, and the settings of culturally important sites. The absence of a thorough worst-case scenario analysis further undermines any assertion of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelmingly dominant and inescapable. Therefore, the resulting change is fundamental and permanent, rather than being amenable to reduction through mitigation measures.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity

of the environment, or the intertwined nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the conclusion that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are critical for understanding potential environmental impacts. The intended seabed preparation and installation works are set to occur within a dynamic Atlantic environment; however, there is a lack of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application leans on the establishment of mitigation and contingency measures post-consent, which renders any assessment of their effectiveness or adequacy impossible at this stage.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises substantial concerns. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to contamination and sediment disturbance. Although the application identifies risks like sediment mobilisation and accidental spills of chemicals or oil, it fails to offer adequate strategies for preventing, controlling, or monitoring these occurrences.

Additionally, there is notable uncertainty surrounding the scale and behaviour of sediment plumes that could result from the proposed seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains unclear what the ecological impacts, duration, and extent of these disturbances might be. This uncertainty also encompasses potential effects on sensitive marine species and habitats already recognised in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application hinders the assessment of whether sufficient safeguards exist to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to properly evaluate environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Evaluations of likely significant effects and mitigations must be conducted prior to granting consent. The lack of critical information not only hampers lawful determination but also demonstrates non-compliance with policy stipulations regarding environmental protection and water quality.

In summary, the deficiencies outlined—such as the absence of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts—render the assessment fundamentally flawed. These shortcomings impede a

thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a material omission. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, risks creating a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the area's identity and emerging tourism sectors, such as astro-tourism. The failure to consider these aspects leads to a noticeable gap in the overall landscape and environmental assessment.

More critically, the absence of any evaluation regarding the effects on nocturnal wildlife cannot be overlooked. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, preventing an understanding of how aviation lighting may affect these species or contribute to mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species such as Kittiwakes, which might forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential impact has not been addressed. The absence of site-specific night-time data creates a significant deficiency in understanding the ecological impacts.

Without a thorough 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, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact

modelling, and species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

TOURISM

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

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

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

For a community on an island with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly examined as mandated under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for the proposal. The use of an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways—including nocturnal wildlife, complete onshore infrastructure, and tourism effects—render the Environmental Impact Assessment inadequate. This incompleteness prevents a comprehensive understanding of likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duties established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus deeming the application unfit for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs any lawful and evidence-based decision-making. It is essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of the

necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0B786F75

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The application was submitted under the marine licensing and Environmental Impact Assessment regimes. After reviewing the Environmental Impact Assessment Report and the related documentation, this objection highlights several deficiencies in 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, nearly pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful determination. Key environmental data is absent, baseline information is inconsistent and limited, and important elements of the proposal remain undefined. The flexible design framework used in the application hampers a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by solid evidence.

There are notable policy inconsistencies present. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate concerns, and environmental integrity. Such conflicts impact the statutory tests necessary for consent and undermine the ability of the relevant authority to determine that the development aligns with policy standards.

The scale of this proposal is unprecedented in this area, with large turbines situated near the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and cannot support a lawful determination. In light of these concerns, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable evaluation of the environmental repercussions of the proposal. There exists considerable uncertainty due to the employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines. This lack of commitment compromises the integrity of the assessment, leaving both the public and the competent authority unable to grasp the true extent of potential environmental effects.

Key information regarding mitigation measures, monitoring strategies, and management plans remains undefined, leading to a situation where consent is sought under the premise that any environmental harm will be rectified at a later stage. Such a deferral not only obstructs a meaningful assessment of effectiveness but also contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly established prior to determination.

In addition, the application displays substantial evidential deficiencies, such as gaps in baseline data and limitations in methodology. Reliance on assumptions rather than site-specific evidence exacerbates uncertainty concerning the scale and significance of impacts. This is particularly evident when negligible or non-significant effects are concluded without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

Due to these shortcomings, the application does not meet the necessary evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to show that impacts have been thoroughly evaluated or that appropriate safeguards are established.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These serious deficiencies prevent a lawful and robust evaluation of environmental effects, ultimately leaving the competent authority incapable of making an informed decision based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the necessary requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured comparison of realistic alternatives based on their environmental impacts, it presents a narrative that outlines the project's evolution. This method does not show that the developer has appropriately identified, assessed, and selected less harmful options over more damaging ones.

There is a lack of clear and evidence-based comparisons regarding 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 the visual, ecological, and coastal effects would likely be less severe. The West Lewis coastline is particularly sensitive, and the critical role of proximity to shore in evaluating impact makes the absence of this analysis significant. Without it, one cannot conclude that the proposed siting is the least damaging option available.

This issue extends to cable routing and landfall assessment, with inadequate evidence that alternative routes have been explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually important sites like Barvas Cemetery. The lack of a clear strategy for avoidance and insufficient comparative analysis suggest that mitigation by design has not been implemented, leading to a reliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through thoughtful site selection, layout, and routing of infrastructure. This demonstrates a failure to follow the established mitigation hierarchy and impedes the competent authority's ability to assess whether less harmful and more suitable alternatives exist. The absence of a thorough alternatives assessment raises doubts about whether the proposal is sustainable or compliant with policy.

From a policy standpoint, this shortcoming jeopardises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, further supporting the conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species lacks completeness and reliability, failing to present a thorough understanding of ecological receptors in the West Lewis coastal environment, which is known for its biological sensitivity and activity. The methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species, leading to an insufficient evidential basis for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their utilisation of coastal zones for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction disturbances, noise, and increased activity have not been sufficiently examined, thereby undermining any assertions about the absence of significant effects on this species.

Deficiencies are also evident in the evaluation of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which likely results in an underestimation of their presence, especially when compared with established land-based observations that demonstrate frequent usage of these waters. The failure to incorporate or thoroughly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs meaningful evaluations of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the genuine 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 the identification and assessment of protected species have not been adequately undertaken. The uncertainty introduced prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with this development is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. Despite the development being situated within key foraging areas and migratory pathways, the application fails to adequately evaluate the potential impacts of displacement, collision risk, or habitat loss on these vital species.

There exists a critical contradiction within the application, as the developer claims that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that the conclusions drawn are unsupported by the available evidence. The assessment inadequately addresses whether seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, with a lack of thorough consideration given to the importance of these feeding grounds. The reliance on modelling approaches further introduces uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars.

Moreover, placing turbines within a recognised migratory corridor poses an additional

and substantial risk, effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term repercussions of sustained mortality in this corridor or the potential impacts on species that have relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This activates the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The submission of the application raises substantial concerns regarding the assessment of social impacts, health, and wellbeing, which is critically deficient and lacks the requisite transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment, which included consultations with local residents; however, the comprehensive report remains unpublished. This absence constitutes a significant evidential gap that obstructs both public understanding and the competent authority's ability to fully grasp the social risks outlined in the developer's own research.

Existing summaries reveal that residents are currently enduring significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement and are therefore factual rather than speculative. The failure to disclose the complete assessment inhibits proper scrutiny of these findings and limits the determination of their significance within the decision-making process.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings indicating a potential for "cultural loss." Despite this acknowledgment, these detrimental impacts have not been adequately incorporated into the main application or afforded appropriate weight. The lack of access to the full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, especially when community character and functionality are potentially at stake. The failure to provide the complete dataset results in an application that lacks a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not satisfactorily demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avert harm, yet the available evidence suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and indicates a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, combined with evidence of current adverse effects, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Moreover, the assessment fails to recognise the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance. The proposed industrialisation of the seascape risks severing these crucial relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises serious concerns due to the incomplete assessment of construction and pollution risks, which lacks the necessary detail to properly evaluate the likely environmental effects. The project plans include significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application suggests that mitigation and contingency measures will be developed after consent is granted, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined measures is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of 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 sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes that could result from seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to

ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This approach introduces procedural risk and undermines the ability 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 necessary mitigation must be evaluated before consent is granted, and when such information is absent, a lawful determination cannot occur. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to a materially deficient assessment. These significant shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application under review fails to adequately protect or maintain these critical habitats and uses, leading to significant concerns regarding ecological and socio-economic impacts. The assessment of fisheries and marine life is lacking, particularly in its evaluation of fishing displacement, which is presumed to occur without consequence. There is no evidence presented that alternative fishing grounds are accessible or can sustain additional pressure, a significant oversight that raises the risk of overfishing and potential economic fallout for the local fleet.

Moreover, the proposal poses considerable risks to marine species, especially due to underwater noise from construction activities. The high-energy hammer piling anticipated over an extended duration is likely to disturb marine life across vast distances, impacting species such as dolphins. Concerns have been raised about the predicted disturbance affecting a substantial part of the local bottlenose dolphin population, yet the application downplays the significance of these effects without adequate supporting evidence.

The application also reveals contradictions, acknowledging the necessity for licences for any harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the assessment's credibility and

raises questions about compliance with the Habitats Regulations, particularly where potential harm is identified that may warrant legal authorisation.

Cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities have not been sufficiently evaluated. The lack of a comprehensive assessment of these combined effects leaves the overall implications for marine ecosystems and socio-economic conditions unclear.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, precluding any assertion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the reliability of the assessment, thereby obstructing a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking, failing to take into account the full extent of impacts associated with what is essentially a singular integrated project. The interconnection between offshore turbines and onshore works necessitates a unified assessment; however, they are evaluated separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components involve the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure traversing sensitive landscapes. Notably, these works include excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts comprehensively, the application fails to enable a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; the disjointed assessment of offshore and onshore elements prevents a full understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, revealing a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises issues related to carbon balance. Disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that runs counter to the aims of renewable energy development. The application fails to address this concern adequately or show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises the possibility of conflicts with existing land use and legal rights. The application does not provide evidence that the required consents or processes have been initiated, leading to uncertainties regarding deliverability and lawful implementation.

From a policy standpoint, the failure to assess the entire project cohesively and demonstrate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The lack of ability to demonstrate that impacts can be avoided or mitigated further undermines the application.

In summary, the separation of project components, the absence of a thorough assessment, and the lack of supporting evidence on environmental and land use impacts render this section of the application incomplete and unreliable, which impedes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that is visible over long distances along the West Lewis coastline, which is characterised by exceptionally dark skies. These dark skies play a crucial role in the area's environmental quality, cultural identity, and tourism value. The lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is a significant omission in the Environmental Impact Assessment as the application does not assess the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the area's identity and to emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any lighting impact assessment or phototaxis study, neglecting to evaluate how aviation lighting may affect these species or lead to increased mortality.

The reliance on daytime survey data in the ornithological assessment further

compounds this omission, as it does not capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

From a policy standpoint, the omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the broader assessment of landscape and seascape impacts, given that night-time character is an integral part of the environment.

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. 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 might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Nonetheless, the application does not model the potential impacts of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in the understanding of impacts on a recognised and growing part of the local economy.

In an island community characterised by limited economic diversification, the lack of

consideration for tourism impacts carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the requisite to demonstrate net benefit. It conflicts with strategic objectives identifying tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This undermines the ability to conduct a rigorous evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was identified. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination of the application reveals significant deficiencies in the evidential basis necessary for determination. There are notable gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the exclusion of essential impact pathways such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of likely significant effects or residual impacts.

There are evident procedural shortcomings, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, largely due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring their effects on peatlands,

carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been fulfilled, which engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposal would lead to significant 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 impacts on tourism represent lasting effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

I am very concerned about the impact on the environment. Pollution, effect on marine life, disruption to the sea bed and and mamm other sea life and birds.

I have chosen to live in this beautiful unspoilt and developed part of Scotland. It's rugged remote landscape will be truly destroyed. Why? when many of the land based turbines are often switched off because the grid can't handle the amount of power being generated. It begs the question is the motivation to build such a polluting monstrosity, financial gain for the turbines to be switched off on a regular basis. I cannot comprehend why this development should go ahead when the existing so called green energy solar and wind turbines already are too much for the national grid to handle. Let alone the interconnector. This island should not suffer by becoming a commodity for wind. Islanders pay a premium for their energy supply. So to add insult to injury we have to suffer the consequence to our physical and mental wellbeing by having this eyesore to look at every day. Construction, paint, oils, service boats are all going to add to the impact on the marine environment. The so called grants, jobs etc that are being offered does not justify nor is acceptable when the impact it will have on the local people and environment. People come to this island to experience the natural beauty, and the dark skies. All this will be changed.

Noise and visual impact along with the disruption to the view in daylight and night sky and auroras is what I will be faced with if this development goes ahead. We live in an area that overlooks a Site of Outstanding Natural Beauty, our business relies on tourism and the first thing our visitors remark on is the beautiful views and landscape. Not for much longer if this goes ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2B442DE6

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and lacks a comprehensive, transparent, or reliable analysis of the potential environmental impacts of the proposed development. The adoption of a flexible Project Design Envelope, which lacks commitments to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This uncertainty hinders the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the assessment. Consequently, the impacts described may not accurately represent those associated with the eventual construction, which obstructs both the public and the competent authority from grasping the true extent of the environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. This reliance implies that any environmental harm will be resolved post-consent, thereby impeding any substantive evaluation of the effectiveness of these measures or assessment of residual impacts. Such deferral of crucial information to later stages is procedurally unacceptable and contradicts the core intent of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation strategies be clearly established before determination.

Moreover, substantial evidential gaps exist within the report, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of the impacts, especially when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of both cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been established 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 gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects and mean the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, it presents a narrative about project development. This approach does not show that less

harmful options have been properly identified, evaluated, or chosen over more damaging alternatives.

There is a lack of clear and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has seriously examined the possibility of placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact highlight the significance of this oversight, as the absence of such analysis prevents any conclusion that the proposed site is the least harmful.

The issues extend to the assessment of cable routing and landfall, with inadequate evidence showing that alternative routes have been sufficiently investigated to avoid or reduce impacts on sensitive areas. This includes cultural and spiritual sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been considered, leading to reliance on mitigation measures after design completion.

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

From a policy viewpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community well-being. The absence of a structured comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been properly evaluated and cannot be legally approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. The assessment of marine ecology and protected species fails to provide a complete or reliable understanding of ecological receptors in this area. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant omission is the failure to properly recognise and assess otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not adequately consider their core foraging range and behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed, undermining any conclusions about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the application is significantly flawed, with considerable gaps in evidence and internal inconsistencies undermining its conclusions. Notably, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. It is situated within key foraging areas and migratory pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A fundamental contradiction arises in the application where the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not adequately supported by the underlying evidence. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in areas where baseline data is lacking and

behavioural responses remain poorly understood.

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

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

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and inadequate evidence. These deficiencies obstruct a thorough evaluation of impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vibrant cultural landscape where the environment, language, traditions, and community are intricately linked. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, treating heritage merely as a collection of static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised as static features, despite being active places of burial and spiritual practice. This oversight neglects their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the cultural effects have not been adequately evaluated, disregarding the essential role these sites play in community life.

The assessment also overlooks intangible cultural heritage, including the Gaelic language and traditions that are essential to the area's identity. This omission represents a significant failure, as these elements are vital for understanding the full cultural impact of the proposed development.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as

characteristics of an Indigenous People. Yet, no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical issue is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone undermines the lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to account for both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear departure from policy obligations.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and compliance with statutory requirements results in a significant evidential gap. The cultural impacts of the development remain improperly evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The submission of the application raises substantial concerns regarding the assessment of social impacts, health, and wellbeing, which is critically deficient and lacks the requisite transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment, which included consultations with local residents; however, the comprehensive report remains unpublished. This absence constitutes a significant evidential gap that obstructs both public understanding and the competent authority's ability to fully grasp the social risks outlined in the developer's own research.

Existing summaries reveal that residents are currently enduring significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement and are therefore factual rather than speculative. The failure to disclose the complete assessment inhibits proper scrutiny of these findings and limits the determination of their significance within the decision-making process.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings indicating a potential for "cultural loss." Despite this acknowledgment, these detrimental impacts have not been adequately incorporated into the main application or afforded appropriate weight. The lack of access to the full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, especially when community character and functionality are potentially at stake. The failure to provide the complete dataset results in an application that lacks a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not satisfactorily demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avert harm, yet the available evidence suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and indicates a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, combined with evidence of current adverse effects, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines near the West Lewis coastline presents immediate and serious risks to both the environment and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped landscape, and a profound sense of remoteness. The placement of turbines in such proximity to the shoreline would create a persistent industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The assessment of visual impacts associated with this development is critically flawed, failing to convey the full extent of the proposed changes. The size and location of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. Consequently, this would severely diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The lack of an adequate representation of this impact, particularly within such a delicate landscape, is deeply concerning.

Moreover, there are significant methodological shortcomings regarding the selection and presentation of visual viewpoints. Current evidence indicates that the chosen viewpoints do not effectively encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, thus

compromising the overall reliability of the assessment.

Additionally, the evaluation fails to address the intricate relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections with the Atlantic horizon. By treating these heritage assets as isolated elements, the assessment neglects their interdependence, resulting in an incomplete understanding of their settings and cultural importance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which mandates the protection of natural environments and historic sites. The anticipated changes are at odds with the need to preserve landscape character, visual amenity, and the context of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertions of compliance with policy requirements.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelmingly dominant. The resulting changes are thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

In summary, the assessment inadequately represents the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

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

The reliance on unspecified future measures raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats, which are susceptible to disturbances and contamination due to sediment. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental

chemical or oil spills, it fails to provide adequate details on the prevention, control, or monitoring of these risks.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

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

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

In summary, the deficiencies surrounding the absence of clearly defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These failings obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal introduces substantial risks to marine species due to underwater noise generated during construction. High-energy hammer piling over an extended period is expected to cause disturbance across large distances, which may adversely affect species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. However, the application downplays the significance of these effects, lacking sufficient supporting evidence.

There is a notable inconsistency within the application, where the need for licences to permit harm to European Protected Species is acknowledged. Yet, impacts are described as negligible simultaneously. This contradiction undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially where anticipated harm may require legal authorisation.

The assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis

coast support a diverse marine ecosystem alongside an active fishing industry. Nonetheless, the application does not demonstrate how these uses and habitats can be preserved or maintained without significant disruption.

A primary issue lies in the assumption that fishing activity can be displaced without consequence. The application lacks evidence indicating that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is critical, as displacement may lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fleet. Without a clear, evidence-based assessment, the impacts on fisheries and livelihoods remain poorly understood.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal suffers from a significant deficiency in the assessment of onshore infrastructure, failing to account for the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated separately, resulting in a disjointed approach that masks the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and is an ecologically significant habitat. The current application lacks a thorough assessment of these impacts, thus obstructing a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application undermines the potential for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all project components

must be considered collectively; nevertheless, the distinction between offshore and onshore elements obscures the comprehensive understanding of their combined effects on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, highlighting a notable evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide proof that requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to ensure the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further diminishes the reliability of the application.

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and untrustworthy, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect

these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. 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 investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the absence of any evaluation regarding dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analyses renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The economic impact of tourism on the Isle of Lewis is critically significant, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the assessment conducted by the application is profoundly deficient, failing to adequately evaluate how large-scale offshore infrastructure may affect visitor numbers, behaviour, or overall economic contributions. It is acknowledged that 86% of visitors are attracted by the area's stunning scenery, yet there is no quantified analysis to demonstrate how the industrialisation of the seascape and a decline in environmental quality could influence tourism's Gross Value Added or the broader economic resilience of the island.

The importance of unspoiled landscapes and dark skies to the visitor experience and emerging tourism markets, such as nature-based and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the potential impacts on a vital and expanding segment of the local economy. Furthermore, in a community with limited economic diversification, neglecting to assess the effects on tourism raises serious concerns regarding employment, local businesses, and community sustainability.

The application does not include a compliant Island Communities Impact Assessment,

resulting in an unaddressed evaluation of these economic vulnerabilities, as stipulated under the Islands (Scotland) Act 2018. Policy-wise, the failure to demonstrate compliance with the National Planning Framework 4 is evident, particularly concerning economic impact and the necessity to illustrate a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to assess the economic ramifications of the proposal.

In sum, the lack of a comprehensive evaluation of tourism impacts, the failure to consider environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This undermines any robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application's inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, largely due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be acceptable.

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

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

As a family member of residents of Brue, I visit regularly.
3.5 miles off coastline is not necessary. Further out as per other windfarms seems more reasonable.

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: 53026ECF

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 was submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The design, scale, and proximity of the proposal raise serious issues regarding its alignment with statutory obligations, national policy, and the principles of sustainable development.

There is a lack of sufficient evidential support to permit a lawful determination regarding this application. Essential environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal have yet to be defined. The application utilises a flexible design framework, which obscures a clear assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust supporting evidence.

Policy conflicts are both clear and substantial. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, thereby undermining the competent authority's ability to determine whether the development meets policy acceptance.

The unprecedented scale of the proposal presents notable challenges in this particular location, as large turbines are proposed to be situated near the shoreline, raising serious issues concerning landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a comprehensive, transparent, or reliable overview of the proposal's likely environmental effects. Central to this inadequacy is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty, hindering the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, restricting both the public's and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unarticulated at this stage. Seeking consent based on the premise that environmental harm will be mitigated subsequently obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. Such a deferral of vital information to post-consent phases is procedurally unacceptable, contradicting the essential purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These issues contribute to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot confirm that impacts have been thoroughly assessed or that appropriate safeguards have been established.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide a thorough assessment of alternatives, which is a significant shortcoming under the Environmental Impact Assessment regime. Instead

of offering a clear and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the project's evolution. This narrative approach does not prove that less harmful options were properly identified, evaluated, and selected over more damaging ones.

Additionally, 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 seriously considered placing turbines further offshore, where impacts related to visual, ecological, and coastal factors would likely be diminished. The sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in assessing impact highlight the inadequacy of the analysis provided, preventing any conclusions that the proposed siting is the least damaging option available.

These issues extend to the analysis of cable routing and landfall, with insufficient evidence presented that alternative routes were adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signals that mitigation by design has not been prioritised, instead relying on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a rigorous assessment of alternatives, it cannot be concluded that the proposal offers a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially regarding the protection of natural environments, 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 is severely lacking, resulting in an incomplete understanding of the ecological receptors within the West Lewis coastal environment. This region is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to acknowledge and assess their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and

behavioural patterns leads to an inadequate assessment of the potential effects from construction disturbances, noise, and increased activity. This gap undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from significant deficiencies, particularly due to the reliance on aerial surveys, which introduce considerable detection bias in 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 include or adequately consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk posed to marine species and habitats.

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

Overall, 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, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The development is situated within critical foraging areas and migratory routes on the west coast of the Isle of Lewis, which is known to host internationally significant seabird populations. These populations are already facing declines, and the application does not adequately prove that these species will not suffer adverse effects. The ornithological assessment presented contains significant gaps and internal inconsistencies, undermining its conclusions. It fails to thoroughly evaluate the potential risks associated with displacement, collision, and habitat loss for these birds.

A key contradiction arises from the developer's assertion that there will be no significant adverse effects while simultaneously advancing a case for Habitats Regulations derogation, which is necessitated only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions are not substantiated by the available evidence. There

is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. The assessment inadequately considers the importance of these feeding grounds, and the reliance on modelling approaches introduces additional uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain insufficiently understood.

The placement of turbines within a recognised migratory corridor poses a further significant risk, effectively establishing a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of potential sustained mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential standard to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with 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 precludes a lawful conclusion that would support consent. Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These deficiencies impede a thorough evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a living cultural landscape where environment, language, tradition, and community are intricately linked. The assessment of cultural heritage and community identity fails to recognise this connection, adopting a reductive view that treats heritage merely as a collection of static assets. It neglects to acknowledge the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

Cemeteries at Dalmore, Bragar, and Barvas are examples of culturally significant sites that are active places of burial and spiritual practice. However, the assessment inaccurately categorises them as static features, overlooking their continued use and meaning while failing to consider the impact of development on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to align with established principles of participation in cultural and environmental decisions.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination of the proposal unlawful.

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

Ultimately, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a full disclosure of the Social Impact Assessment, which is crucial for understanding social impacts, health, and wellbeing. The developer has conducted focus groups with local residents but has not published the complete report. This creates a significant gap in evidence and inhibits both public understanding and the competent authority's ability to assess social risks identified in the developer's research.

Residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. However, without the full assessment, the findings cannot be properly scrutinised, limiting the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion,

with references to “cultural loss” found in the developer’s own results. Unfortunately, these impacts have not been adequately integrated into the application or given sufficient consideration. The absence 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. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at risk. The failure to provide the full 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 adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the evidence currently available indicates existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural implications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application 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, along with evidence of existing negative impacts, makes the assessment incomplete and unreliable. This inhibits a lawful determination and supports the conclusion that the application lacks sufficient information.

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

The reliance on unspecified future measures raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is

home to clean coastal waters and crucial habitats, which are susceptible to disturbances and contamination due to sediment. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on the prevention, control, or monitoring of these risks.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

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

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

In summary, the deficiencies surrounding the absence of clearly defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These failings obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of marine life and fisheries. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital habitats and uses can be safeguarded from disruption.

A major flaw in the application is the assumption that fishing activities can be shifted without negative consequences. There is no evidence presented that alternative fishing grounds exist or that they can support the pressure from displaced activities. This is a crucial gap, as such displacement may lead to overfishing in other areas, potentially impacting the local fishing fleet's economic viability. Without a thorough assessment based on evidence, understanding the implications for fisheries and local livelihoods remains incomplete.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise from construction activities. The use of high-energy hammer piling for an extended period is likely to disturb marine life over considerable distances, which could affect species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application appears to minimise these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application. While it acknowledges the need for licenses to allow harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction questions the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially in cases where harm necessitates legal approval.

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

In terms of policy compliance, the application does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies render the assessment incomplete and unreliable. These issues hinder any robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents serious concerns regarding the integrity of its environmental assessment. The assessment of onshore infrastructure is materially incomplete, as it fails to consider the full extent of impacts from what is fundamentally a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are evaluated separately, resulting in a fragmented approach that conceals the actual scale of environmental and socio-economic effects.

Key onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application does not offer a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application

obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered as a whole. However, the separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises alarm over carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that is at odds with the goals of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains positive.

The routing of infrastructure through active croft land introduces 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 serious questions about the deliverability and lawful implementation of the project.

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

In conclusion, the disconnection of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create an intrusive "wall of light" effect visible over long distances, fundamentally changing the night-time environment of the West Lewis coastline. This area is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The application lacks any assessment of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors, thereby overlooking the crucial role that dark skies play in the area's identity and in burgeoning sectors such as astro-tourism.

Moreover, there is no evaluation of how this lighting will affect nocturnal wildlife. Sensitive species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk due to phototaxis, which can lead to disorientation and a higher likelihood of collisions. The absence of a lighting impact assessment or a phototaxis study means that the proposal does not consider the potential adverse effects of

aviation lighting on these species or the risk of 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. Other species, including Kittiwakes, that may forage or migrate during the night are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. This critical gap in site-specific night-time data prevents a comprehensive understanding of the ecological impacts.

Without an assessment of these nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the safeguarding of natural spaces and environmental quality. It diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

TOURISM

The proposal under consideration overlooks the essential economic and social impacts on a vital sector of the Isle of Lewis economy, specifically tourism. This sector relies heavily on the area's wild coastline, nearly unblemished landscape, dark skies, and its inherent sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the island has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, contributing up to 16% to the local economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and the accompanying decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in underpinning tourism, including the necessity of unspoiled landscapes and dark skies for an enriching visitor experience. The exclusion of a Dark Skies Assessment

exacerbates this shortcoming, creating a considerable void in understanding the impacts on a recognised and expanding part of the local economy. This is particularly pertinent for an island community characterised by limited economic diversification, where the lack of impact assessment on tourism extends to broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to substantiate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate a net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failures to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminate in a significant evidential gap. This gap hinders a thorough assessment of the economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with the principles of sustainable development as dictated by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. This new application is submitted under a more robust policy framework, which prioritises biodiversity, peatland preservation, landscape integrity, and community wellbeing, yet it fails to meet these vital requirements.

The evidential basis for the application is markedly incomplete and unreliable. Notably, there are substantial gaps in baseline data, the proposal relies on an undefined design envelope, and the mitigation measures suggested remain unspecified. Furthermore, important impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment does not provide a comprehensive understanding of the potential significant effects or residual impacts.

In addition to the shortcomings in evidence, there are also notable procedural flaws. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such deficiencies hinder the competent authority's ability to properly evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application inadequate for determination.

The proposal is fundamentally at odds with the National Planning Framework 4. It does not establish adequate protection for biodiversity, natural environments, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit, particularly due to the absence of modelling regarding tourism impacts. Additionally, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential consequences for peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful determination that 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, disruption of cultural and visual connections, and adverse effects on tourism present permanent changes that cannot be adequately mitigated.

Collectively, these issues render the application both procedurally and substantively unfit for determination. The vast scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is incumbent upon the competent authority to refuse consent based on these grounds or to invoke the relevant regulatory provisions to demand the submission of the necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 28EC0CC6

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, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and a near-pristine environment that reflects a strong cultural identity. However, the proposal raises fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report and supporting documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework further complicates the ability to assess likely significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are substantive policy conflicts associated with the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests for consent and impair the ability of the competent authority to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate for supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposed development is accompanied by an Environmental Impact Assessment Report that is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable evaluation of the expected environmental impacts. The flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. This diminishes the integrity of the assessment, leaving both the public and the competent authority without a clear understanding of the actual environmental effects of the development that may ultimately be constructed.

The application leans heavily on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these conditions implies that any environmental damage will be addressed only after approval, inhibiting a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of essential information to stages following consent is not procedurally acceptable and contradicts the aims of the Environmental Impact Assessment framework, which stipulates that likely significant effects and mitigation strategies must be clearly defined before any determination.

Additionally, the application is marred by substantial evidential deficiencies, including missing baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainty concerning the scale and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate 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 rendering the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies obstruct a lawful and thorough assessment of environmental impacts and leave the competent authority ill-equipped to make a determination based on the information currently available.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the assessment approaches cultural heritage in a reductive manner, viewing it as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Notably, the evaluation does not adequately consider culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment regards them as mere static features, disregarding their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural ramifications and overlooks their importance in community life.

Additionally, the intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring bond between the community and the coastal environment, are not taken into account. These elements are vital to the area's identity, yet they are conspicuously missing from the assessment, resulting in a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains unexamined.

There are pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity and the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement calls into question the validity of the assessment and neglects essential principles of participation in matters that affect cultural and environmental interests.

A significant 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 assess the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings conflict directly with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application without a solid foundation for understanding the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application demonstrates a significant deficiency in assessing social impacts, health, and wellbeing, undermining the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included engagement with local residents through focus groups. However, the failure to publish the full report results in a critical evidential gap, obstructing both public understanding and the competent authority's ability to grasp the full extent of the social risks identified by the developer's research.

Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement rather than speculation. Nevertheless, the lack of disclosure of the complete assessment hinders proper scrutiny of these findings and limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence that the proposed development is viewed as a threat to community identity and cohesion, with the term “cultural loss” explicitly mentioned in the developer’s findings. Despite this acknowledgment, these impacts have not been adequately integrated into the application or given the necessary weight. The non-disclosure of the full Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency fundamentally compromises the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be at stake. By withholding the full dataset, the application fails to provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm, yet the available evidence highlights existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with this policy cannot be validated.

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 omission constitutes a material failure within the application and does not satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped 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.

TOURISM

The application inadequately assesses the impacts on tourism, which is vital to the economy of the Isle of Lewis. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has witnessed substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such an analysis, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the role of environmental quality in bolstering tourism is not addressed. The significance of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this recognised and growing segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and the sustainability of the community within this island context that has limited economic diversification. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, the neglect to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns about its alignment with sustainable development principles as outlined in statutory duties, national policy, and evidential standards. It mirrors the issues that led to the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Despite being presented within a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal falls short.

Critical gaps in baseline data undermine the evidential basis for decision-making. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to consider significant impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects leave the Environmental Impact Assessment incomplete. This lack of thoroughness prevents an understanding of likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, masking impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, indicate that the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, thereby preventing a lawful conclusion regarding the acceptability of impacts.

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

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

Additional Comments

Whilst being in principal a supporter of renewal energy solutions... This is not the answer.

A huge development which impacts hugely on a natural environment and a true wild place.

Why so big, and why so close to the shore? The islands will be changed forever. Why can we not go for a more moderately sized project which is situated further offshore. And why does the demands for power of a large population need to impact on some of the most sparsely populated areas.

Keep wild places wild, and develop renewable community based projects in already industrialised areas.

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: E9599D59

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its accompanying documents, highlighting material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns surrounding the scale, proximity, and design of the proposal raise fundamental questions regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation necessary for a lawful determination. There are notable gaps in critical environmental data, and the baseline information presented is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework complicates the understanding of likely significant effects. The reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident throughout the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises significant issues, with large turbines planned in close proximity to the shoreline, which introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In summary, the combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is significantly deficient, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are fundamentally intertwined. The application adopts an overly simplistic approach, viewing heritage as a collection of separate, unchanging assets, rather than recognising their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and centres for spiritual practice, yet they are characterised as static elements in the assessment. This oversight neglects their ongoing significance, use, and the implications of development on their surroundings. Such a misrepresentation leads to an incomplete understanding of cultural impacts, disregarding their integral role in community life.

Additionally, the assessment overlooks the intangible aspects of cultural heritage, which encompass the Gaelic language, traditions, and the enduring relationship between the local community and the coastal environment. These components are vital to the area's identity, yet they are completely excluded from consideration, marking a considerable gap. Without addressing these elements, the true cultural impact of the proposed development remains unclear.

There are also serious concerns regarding community engagement and rights. The Gaelic-speaking population maintains a unique cultural identity recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in matters that affect cultural and environmental interests.

Moreover, a crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts 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 preservation of historic assets and spaces. The failure to take into account both tangible and intangible heritage, as well as to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a substantial evidential void. The cultural ramifications of the proposed development have not been adequately examined, and the application fails to offer a solid foundation for determining the genuine cultural costs associated with the proposal.

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.

TOURISM

The evaluation of tourism impacts within the application is significantly lacking and does not address the economic and social implications for a vital sector of the Isle of Lewis economy. Tourism heavily relies on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application recognises that 86% of visitors are attracted by scenery, it neglects to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contributions made by tourism.

Since 2017, tourism on the island has seen remarkable growth, rising from £65 million to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the local economy. However, the application does not examine how the potential industrialisation of the seascape and deterioration of environmental quality may impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical assessment, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the analysis omits consideration of the importance of environmental quality in bolstering tourism. Unspoiled landscapes and dark skies are essential to enhancing visitor experiences and fostering new markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates these shortcomings, resulting in a considerable gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight regarding tourism impacts poses broader risks for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been appraised, which is required under the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence contribute to a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable deficiencies in the evidential basis required for determination. The application is marred by critical gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address significant impact pathways, particularly concerning nocturnal wildlife, the entirety of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or any residual impacts.

Procedural failures are also evident in the application. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The impacts on health and wellbeing are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain both uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The required evidential threshold to confirm that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would result in 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 signify permanent effects that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively unfit for determination. The scale of informational deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke relevant

regulatory provisions to demand the submission of the missing information.

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

Additional Comments

While I recognise the importance of renewable energy, such developments must be appropriately sited and should not come at the expense of areas whose economic vitality and cultural significance depend on their natural and visual qualities. In this case, the balance between benefit and harm has not been adequately justified.

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: E02E5267

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm. The application falls under the marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals several significant deficiencies relating to planning, environmental impact, cultural considerations, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The application lacks a solid evidential foundation for a lawful decision. Important environmental data is absent, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the project are not clearly defined. The use of a flexible design framework obscures the likely significant effects, while the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are evident conflicts with existing policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine that the development aligns with policy objectives.

The scale of the proposed project is unprecedented for this area, with large turbines sited close to the shoreline, raising substantial issues related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy requirements indicate that the application is incomplete. It fails to support a lawful determination, and therefore, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which

lacks commitments to specific turbine dimensions, layouts, or configurations, generates substantial uncertainty and hinders the consistent application of a worst-case scenario. This issue undermines the integrity of the assessment and obscures the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not been adequately defined. As such, consent is being sought with the expectation that any environmental harm will be addressed at a later stage. This approach obstructs meaningful evaluations of effectiveness and an assessment of residual impacts. The deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly identified prior to determination.

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, especially 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 conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot determine the application based on the information that has been provided.

ASSESSMENT OF ALTERNATIVES

The application presented fails to provide a proper assessment of alternatives, which is critical under the Environmental Impact Assessment regime. Instead of offering a structured comparison of viable alternatives based on their environmental effects, it merely recounts the evolution of the project. This narrative does not demonstrate that less harmful options have been identified and evaluated in preference to more damaging solutions.

Furthermore, there is a lack of transparency and evidence in comparing alternative

offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts could be lessened. Considering the sensitivity of the West Lewis coastline, and the crucial role of proximity to shore in assessing impact, this oversight means it cannot be concluded that the proposed siting is the least damaging option.

The issues are also evident in the cable routing and landfall assessment, where insufficient evidence has been provided to show that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis imply that there has been no application of mitigation by design, relying instead on measures that would be implemented after the design phase.

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

From a policy standpoint, these deficiencies jeopardise adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission, contributing to the overall finding that the application has not been sufficiently assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment presented regarding marine ecology and protected species is inadequate, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both sensitive and biologically active, yet the baseline data remains incomplete. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

There is a significant oversight concerning otters, which are a European Protected Species. The application does not appropriately recognise or evaluate their active use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns means the assessment does not adequately consider the potential effects of construction activities, noise, and increased human presence. As a result, the conclusions regarding the absence of significant impacts on this species are undermined.

Moreover, there are notable deficiencies in the assessment of basking sharks. The reliance on aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data leads to an incomplete baseline, compromising the reliability of the conclusions drawn.

These methodological shortcomings result in claims of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation introduces uncertainty regarding the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty created prevents any conclusion about adverse effects from being excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical inconsistency within the application arises from the developer's assertion of no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is required only when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that the conclusions drawn are not substantiated by the supporting evidence. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The assessment does not

sufficiently consider the importance of key feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda, and the reliance on modelling approaches introduces further uncertainty.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is not merely a geographical area; it embodies a living cultural landscape where environment, language, tradition, and community interlink deeply. The assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a series of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community. This reductive approach fails to acknowledge the integral nature of these cultural elements.

A significant shortcoming is evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features. This oversight neglects their continuous use and meaning, resulting in an incomplete understanding of the cultural effects and disregarding their significance within community life.

The application also neglects to assess intangible cultural heritage, including the Gaelic language and traditions that form the foundation of community identity in the area. This omission is notable as these elements are vital to understanding the cultural impact of the development. Without their inclusion, the assessment remains deficient and fails to capture the true cultural cost of the proposed development.

Additionally, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised as having the characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the

assessment and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, a significant procedural failure exists due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy perspective, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sufficient basis for evaluating the genuine cultural implications of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not accurately represent the extent of the visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The significance of this impact has not been properly conveyed, particularly considering the sensitivity of the landscape.

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

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

The proposed industrialisation of the seascape would sever these relationships,

altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately assessed.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. Notably, it involves extensive seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated post-consent, which obstructs a meaningful assessment of their adequacy and effectiveness.

This reliance on undefined future measures is especially troubling given the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it lacks sufficient detail on the strategies to prevent, control, or monitor these incidents.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of such impacts. This uncertainty also encompasses the potential effects on marine species and habitats identified as sensitive within the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application fails to allow for an evaluation of whether adequate safeguards are established to address pollution

events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards stands in conflict with the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; without this information, a lawful determination cannot be reached. 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 detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of 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 convincingly demonstrate that these vital habitats and activities can be preserved without significant disruption.

A critical concern is the erroneous assumption that fishing activities can be displaced without negative consequences. The application lacks any evidence to support the availability of alternative fishing grounds that are both accessible and capable of handling additional pressure. This significant oversight raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment leaves the impacts on fisheries and local livelihoods poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to disturb marine life over large areas, including species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application diminishes the seriousness of these effects without adequate supporting evidence.

There exists a glaring inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring such impacts to be negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Additionally, the assessment neglects to consider the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and fishing displacement.

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 establish that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any determination of the proposal as sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment incomplete and unreliable. These shortcomings impede a thorough evaluation of the proposal's 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 is deficient as it does not include an evaluation of dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal would introduce permanent red aviation lighting that would be visible over considerable distances, creating a continuous and intrusive "wall of light" effect on the western horizon, thereby fundamentally altering the night-time environment.

Furthermore, the application fails to consider the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the region's identity and the emerging tourism sector, including astro-tourism. As a result, there is a substantial gap in the landscape and environmental assessment.

Equally important is the lack of evaluation concerning nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not incorporate any assessment of lighting impact or conduct a phototaxis study to examine the potential effects of aviation lighting on these species and the associated mortality risks.

The situation is exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or related risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, a threat that has not been evaluated. The absence of site-specific night-time data represents a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The necessary

evidential standard to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering 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 diminishes the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital aspect of the ecosystem.

In summary, the lack of any assessment of dark skies and nocturnal wildlife reveals a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of securing a lawful determination.

TOURISM

The assessment of tourism impacts related to the application is grossly inadequate, neglecting to analyse the economic and social repercussions for a critical sector of the Isle of Lewis economy. With 86% of visitors attracted by the area's scenery, which includes its wild coastline, nearly untouched landscapes, dark skies, and remoteness, the lack of a thorough evaluation of how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions is alarming.

Tourism has shown remarkable growth, rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application fails to model the potential effects of industrialising the seascape and the resulting decline in environmental quality on Tourism Gross Value Added or the broader economic resilience. This absence of analysis precludes any determination of whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment disregards the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this deficiency, creating a critical gap in understanding impacts on an increasingly recognised part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unassessed, as required under the Islands (Scotland) Act 2018.

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

to assess the economic implications of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and consider the island's economic dependencies results in a significant evidential gap. This lack of thorough assessment hampers a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. The issues inherent in this proposal mirror those that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application is submitted under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to address these critical elements.

There are substantial deficiencies in the evidential basis provided for this determination. The application lacks comprehensive baseline data, relies on an ill-defined design envelope, and incorporates unspecified mitigation measures. Moreover, it fails to address essential impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, which hinders a thorough understanding of likely significant effects and residual impacts.

Procedural inadequacies are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which constitutes a breach of the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the failure to provide a complete Social Impact Assessment is a material omission. These shortcomings obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal is in clear conflict with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Additionally, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of the cumulative impacts of both offshore and onshore components has not been adequately addressed, thus obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to conclude that adverse effects can be excluded

beyond reasonable scientific doubt has not been met, which invokes the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is poised to induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the impacts on tourism all represent enduring effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority refuses consent on these grounds or utilises the appropriate regulatory provisions to mandate the submission of the required information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F9D83049

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. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, several material deficiencies have been identified across planning, environmental, cultural, and procedural aspects. The development is positioned off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched 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 the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework complicates understanding the likely significant effects, while the reliance on yet-to-be-specified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There are significant policy conflicts associated with the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to show that it meets national requirements for protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal poses additional concerns, with large turbines sited close to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and environmental consequences. Overall, the combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unsuitable for a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents significant flaws, including internal inconsistencies and evidence gaps that undermine its conclusions. The application is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, an area known to support internationally important seabird populations that are already in decline. However, it fails to convincingly demonstrate that these species will remain unaffected.

There exists a fundamental contradiction within the application. The developer asserts that there are 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 its conclusions are not backed by the evidence presented.

The assessment does not adequately address the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical importance of these feeding grounds is underappreciated, and reliance on modelling approaches introduces uncertainty, especially for species like Kittiwakes and Fulmars that are experiencing severe decline. The methodologies employed are likely to underestimate mortality, particularly when baseline data is lacking and species behaviour is not fully understood.

The proposed siting of turbines within a recognised migratory corridor creates a significant risk, forming a barrier along a primary flight path used by birds travelling between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term effects of ongoing mortality in this corridor, as well as the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the proposal does not satisfy the evidential standard required to demonstrate that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling shortcomings, means that the necessary standard of certainty has not been achieved. This situation activates the precautionary principle and renders a lawful conclusion in favour of consent impossible.

These identified deficiencies also indicate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to show that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy.

In summary, the assessment is deemed unreliable due to its inconsistencies, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application does not adequately assess cultural heritage and community identity, particularly along the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application treats heritage as isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet the assessment categorises them as static features, overlooking their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the role these sites play in community life.

Furthermore, the application neglects to assess intangible cultural heritage elements, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are completely missing from the assessment, constituting a significant omission. Without addressing these factors, the cultural impact of the development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles for participation in matters affecting cultural and environmental interests.

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

From a policy standpoint, the deficiencies in the application conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the lack of recognition of living cultural practices indicate a clear deviation from policy requirements.

In summary, the failure to adequately 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 thoroughly examined, and the application lacks a solid foundation for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture both the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposed large-scale turbines, sited in close proximity to the shore, would result in an overwhelming industrial presence that fundamentally transforms this landscape, leading to permanent and irreversible changes.

Furthermore, the application does not accurately depict the extent of the visual impact resulting from the turbines. Their size and closeness would overshadow views from residential areas, historic sites, and popular coastal locations, thereby diminishing visual amenity and undermining the qualities of naturalness and remoteness that define this area. The assessment lacks an appropriate representation of this level of impact, especially considering the sensitivity of the landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This inadequacy raises the possibility that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Another notable gap in the assessment is the neglect of the interconnected relationships between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. However, the evaluation treats these heritage assets as separate entities, failing to acknowledge their interdependence and resulting in an incomplete understanding of the impacts on their setting 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 represents not just a visual impact but a more extensive cultural and spatial detriment that the application has not sufficiently examined.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of transformation is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further detracts from any assertions of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes brought about by this proposal are not amenable to reduction through mitigation measures, leading to fundamental and permanent alterations in the landscape.

In summary, the assessment does not accurately portray the extent of impact, the environmental sensitivity, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and solidify the conclusion that the proposal is incompatible with the protection of this important landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient in its failure to evaluate the impacts of dark skies and nocturnal wildlife. The exceptionally dark skies of the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting would create a pervasive "wall of light" effect across the western horizon, fundamentally changing the night-time landscape.

Significantly, the assessment neglects to examine how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the increasing significance of dark skies to the local identity and emerging tourism sectors like astro-tourism. Consequently, the absence of these considerations represents a considerable shortfall in the overall environmental evaluation.

Moreover, there is no appraisal of the lighting's effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, leading to disorientation and higher collision risks. The lack of a lighting impact assessment or a phototaxis study means that the application fails to address potential threats to these species and the possibility of increased mortality.

This shortcoming is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal behaviours or associated risks. Kittiwakes, which may engage in foraging or migration at night, are also susceptible to 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 an 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 is not satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4, which relates to the safeguarding of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In conclusion, the significant gap in evidential support arising from the absence of assessments concerning dark skies and nocturnal wildlife leaves the application incomplete and incapable of receiving lawful approval.

TOURISM

The proposed development raises serious concerns regarding its impact on the tourism sector, which is a crucial component of the Isle of Lewis economy. The island's appeal is rooted in its wild coastline, nearly untouched landscapes, dark skies, and a profound sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantitative assessment of how large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, with its value rising 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 does not consider how the industrialisation of the seascape and the potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Additionally, the assessment neglects to recognise the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to enhancing visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a substantial void in understanding the potential impacts on this important aspect of the local economy.

Given the limited economic diversification typical of an island community, the failure to evaluate tourism impacts carries broader ramifications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment suggests that the economic vulnerabilities present have not been adequately analysed, 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 necessity of evidencing net benefits. It contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the economic dependency of the island culminates in a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is fundamentally 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

Please don't destroy the beautiful Atlantic coast. There are enough windfarms that don't bring any benefits to those who live close to them

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0A5A77A9

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural heritage. Concerns arise from the scale, design, and proximity of the proposal, questioning its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful assessment. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, many key elements of the proposal remain undefined. This flexible design framework hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are evident and serious policy conflicts inherent in this proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

Moreover, the unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking, as it does not deliver a comprehensive, transparent, or dependable overview of the potential environmental consequences of the proposal. The flexible Project Design Envelope employed in the application, which lacks definitive turbine dimensions, layouts, or configurations, creates notable uncertainty. This lack of specificity compromises the application of a worst-case scenario and diminishes the assessment's integrity, making it impossible for both the public and the competent authority to grasp the true scale of the environmental impacts.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being sought with the expectation that environmental harm will be mitigated at a later stage. This approach hinders any substantial evaluation of the effectiveness of such measures or the assessment of residual impacts. Deferring critical information to post-consent phases is procedurally inappropriate and contravenes the intent of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures are clearly identified prior to any decision-making.

There are also crucial gaps in the evidence presented, including insufficient baseline data, methodological constraints, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, particularly where assertions of negligible or non-significant effects lack robust supporting data. The lack of adequate information inhibits a thorough understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not satisfy the evidential requirements stipulated under the Habitats Regulations to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with the National Planning Framework 4, which includes obligations pertaining to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been fully assessed or that sufficient safeguards are in place.

In summary, the combination of 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 shortcomings obstruct a lawful and thorough evaluation of environmental impacts, thereby leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a proper assessment of alternatives, which does not meet the required standards of the Environmental Impact Assessment regime. Instead of a structured comparison of realistic alternatives based on their environmental

effects, the application offers a narrative of project development. This method does not adequately show that less harmful options have been identified, assessed, and chosen over more damaging alternatives.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, scales of development, or design configurations. The application does not convincingly demonstrate that the developer has considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline is significant, and the choice of siting is crucial in assessing impact. The failure to analyse this means there is no basis to conclude that the proposed location is the least damaging option.

Similar shortcomings are evident in the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually important areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the design did not incorporate mitigation by design, opting instead for reliance on post-design measures.

Consequently, the application does not show that environmental harm has been reduced through site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, preventing the competent authority from determining if there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of assessment undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative analysis is a significant omission that leads to the conclusion that the application has not been properly assessed and is not suitable for a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks the necessary thoroughness and reliability to fully understand the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet the data collected is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, there is no solid evidential foundation for evaluating potential impacts.

One significant oversight pertains to otters, which are recognised as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. By failing to assess their core foraging range and behavioural patterns, it leaves the potential impacts of construction disturbance, noise, and increased human activity unexamined. This shortcoming diminishes any conclusions drawn regarding the absence of significant effects on this

species.

Moreover, the evaluation of basking sharks reveals further issues, particularly due to an overreliance on aerial surveys which introduces considerable detection bias, especially under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, particularly when compared with established land-based observations showing frequent use of these waters. The neglect to integrate or properly assess such data results in an inadequate baseline and undermines the reliability of the conclusions drawn.

These methodological flaws imply that the claims of negligible or non-significant effects stem more from assumptions than from solid evidence. The lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This leaves uncertainty surrounding the real scale of risk faced by marine species and their habitats.

From a regulatory standpoint, the application fails to adhere to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not sufficiently identify or assess protected species. The uncertainty generated prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsubstantiated conclusions culminates in an unreliable assessment. These shortcomings impede a rigorous evaluation of impacts on marine ecology and protected species and lead to the overarching conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed and presents critical gaps in evidence that raise serious concerns about its validity. Located in key foraging areas and migratory pathways, the site of the proposed development has significant implications for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing declines. Alarming, the application fails to provide the necessary evidence that these vulnerable species will not be adversely affected.

A troubling contradiction arises within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case. Such a case is typically only put forward when significant harm is anticipated, which casts doubt on the overall reliability of the assessment and suggests that its conclusions are not adequately supported by the evidence provided. Furthermore, the assessment inadequately addresses the potential impacts on seabirds associated with protected areas, including the Lewis Peatlands

and St Kilda. The critical nature of these feeding grounds has not been sufficiently recognised, and the reliance on modelling techniques introduces considerable uncertainty, particularly for species such as Kittiwakes and Fulmars that are in steep decline.

The siting of turbines within an established migratory corridor presents additional risks, effectively serving as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. There is a notable lack of thorough evaluation regarding the long-term effects of sustained mortality in this corridor, particularly concerning species with smaller global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations of the modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This situation activates the precautionary principle and hinders a lawful conclusion that could support consent.

Additionally, the identified deficiencies illustrate a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to adequately demonstrate that internationally important seabird populations will remain unaffected puts 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 robust evidence. These flaws obstruct a thorough evaluation of the potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposal significantly underrepresents the cultural heritage and community identity associated with the West Lewis coastline. This region is not merely a collection of static assets but a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, failing to recognise the ongoing social, cultural, and spiritual roles that heritage sites play within the community.

Particularly concerning is the treatment of key 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 inaccurately classified as static features in the assessment. This oversight neglects their continued significance and the potential impacts of development on their surroundings, leading to a limited understanding of the cultural effects and their importance in community life.

Furthermore, the assessment disregards the intangible aspects of cultural heritage,

including the Gaelic language and local traditions, as well as the longstanding relationship the community shares with the coastal environment. These elements are vital to the identity of the area, but they are entirely omitted from the evaluation, representing a major oversight. The cultural impacts of the development cannot be adequately assessed without incorporating these factors.

There are additional concerns about community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the validity of the assessment and fails to align with established principles of meaningful participation in decisions that affect cultural and environmental interests.

Moreover, the lack of a compliant Island Communities Impact Assessment is a significant procedural failure. Under the Islands (Scotland) Act 2018, this assessment is a statutory requirement that allows the competent authority to fulfil its legal obligation to consider the social, cultural, and economic impacts on the island community. The absence of this critical evaluation precludes a lawful determination of the proposal.

From a policy standpoint, the identified deficiencies contradict the National Planning Framework 4, especially concerning 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, marks a clear deviation from policy mandates.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts associated with the proposed development remain inadequately evaluated, and the application does not furnish a sufficient basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, which have not been adequately addressed. A Social Impact Assessment was commissioned by the developer, including engagement with local residents through focus groups. However, the full report has not been made available, leading to a significant evidential gap that hinders both the public's understanding and the competent authority's ability to fully grasp the social risks identified by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, as indicated in available summaries. These effects stem from direct engagement with the community and are therefore based on real experiences rather than speculation. The failure to disclose the complete assessment restricts proper scrutiny of these findings and affects the evaluation of their importance in the decision-making process.

Additionally, the proposal has been viewed as a threat to community identity and cohesion, with a noted risk of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment conceals the true human and social costs associated with the development.

This deficiency in disclosure compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health implications is crucial, especially when community character and functionality may be impacted. The absence of the complete dataset means that the application lacks a comprehensive evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing negative effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential requirements established by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of pre-existing adverse effects, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented within the application fails to adequately capture the scale of change and the sensitivity of the West Lewis environment. The coastline is characterised by its open Atlantic horizon, undeveloped landscape, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a significant industrial presence, leading to a permanent and irreversible alteration of this distinctive character.

Furthermore, the evaluation lacks an accurate representation of the visual impact anticipated from the turbines. Their scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thereby negatively affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within the context of such a sensitive landscape.

There are also critical methodological shortcomings in the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This oversight raises concerns that the visual impact may have been understated, thereby compromising the assessment's overall reliability.

Another notable deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and various Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their link to the natural horizon. This goes beyond merely a visual impact, constituting a broader cultural and spatial detriment that has not been properly considered in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Thus, the resulting changes would be fundamental and permanent, not amenable to acceptable levels of reduction through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These significant deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

the delicate nature of the receiving environment.

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life in the application is insufficient, lacking a robust evaluation of ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without consequence. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This omission is crucial, as such displacement poses a risk of overfishing in other areas and may lead to wider economic repercussions for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays the importance of these

effects, lacking adequate supporting evidence.

There is an evident contradiction in the application, acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously describing such impacts as negligible. This inconsistency undermines the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, especially where harm is predicted to require legal authorisation.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which ultimately precludes any assertion that the proposal aligns with sustainable development.

The overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore works, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These activities require excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. Unfortunately, the application fails to provide a thorough assessment of the impacts from these works, which inhibits a complete understanding of the overall environmental footprint of the project.

The assessment of onshore infrastructure remains materially incomplete, neglecting to consider the full extent of impacts that arise from what constitutes a single integrated project. The onshore and offshore elements are intrinsically linked, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all project components be considered together; however, the current separation means that the combined effects on peatlands, habitats, and local communities are not adequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are subject to protective policies. The application does

not sufficiently demonstrate that impacts on these crucial habitats have been fully assessed or that appropriate measures to avoid such impacts have been implemented. This leads to a clear evidential gap regarding biodiversity protection.

Moreover, the proposal raises significant concerns about carbon balance. Disturbance of peatland may release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or provide assurance that the overall carbon balance remains positive.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is a lack of evidence in the application regarding the initiation of necessary consents or processes, which raises questions about the deliverability and lawful implementation of the proposal.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. However, the Environmental Impact Assessment fails to include any assessment of dark skies and nocturnal wildlife, representing a significant omission. 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.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of analysis is particularly concerning as dark skies are important to the area's identity and emerging tourism sectors, such as astro-tourism. The resulting gap in the overall landscape and environmental assessment is clear.

Moreover, there is no consideration of the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are sensitive to artificial lighting, which can lead to disorientation and a higher risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not assess how aviation lighting might impact these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate at night, could also face disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to determine if protected species or designated sites would suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. This lack of analysis also undermines the broader assessment of landscape and seascape impacts, as night-time character is a crucial element of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a substantial 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 Isle of Lewis tourism sector has seen significant growth, with its economic contribution 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 local economy. Despite this, the application fails to adequately assess the impacts of proposed large-scale offshore infrastructure on this vital sector. It acknowledges that 86% of visitors are drawn by the area's stunning scenery, yet it does not quantify how industrial developments could affect visitor numbers, behaviours, or the overall economic contributions made by tourism.

Furthermore, the assessment does not consider the crucial role of environmental quality in enhancing the visitor experience, such as the significance of unspoiled landscapes and dark skies. The neglect of a Dark Skies Assessment leaves a substantial gap in understanding the impacts on emerging markets like nature-based tourism and astro-tourism, both of which are important for local economic sustainability.

In an island community with limited economic diversification, the lack of assessment regarding the impacts on tourism raises concerns for local employment, businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that the economic vulnerabilities of the area have not been evaluated as mandated by 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 necessary demonstration of net benefit. It contradicts strategic objectives that position tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic repercussions of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for assessment, with significant gaps in baseline data. It employs an undefined design envelope and depends on unspecified mitigation measures while failing to address critical impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment constitutes a substantial omission. These deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful

determination that impacts are acceptable.

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

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

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

Additional Comments

Listening to folk I know on Lewis and the impact this will have on them due to the building of them, lack of infrastructure for increased of folk involved and also damage it will cause to the area and wild life...also just the look of them in this 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: 36B0621F

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence, raising significant concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework inhibits a clear understanding of potential significant effects. This, coupled with the reliance on unspecified mitigation measures, renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with established policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine that the development meets policy acceptability.

The scale of this proposal is unprecedented in the area, with large turbines situated in close proximity to the shoreline, which introduces serious concerns regarding landscape capacity, visual impact, and environmental consequences. In light of the insufficient information, reliance on undefined mitigation, evidential weaknesses, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a coherent comparison of realistic options based on their environmental impacts, it presents a narrative that details the evolution of the project. This approach does not show that less harmful alternatives have been identified and evaluated in preference to more damaging choices.

There is a significant absence of transparent comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the developer has not adequately considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and its proximity to the shore is crucial in assessing environmental effects. The lack of analysis in this area means that the proposed siting cannot be definitively deemed the least damaging option.

The inadequacies also extend to the routing of cables and landfall assessments, where there is insufficient evidence to suggest that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis indicate a lack of application of mitigation by design, with an undue reliance on post-design measures instead.

Consequently, the application does not 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, hindering the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. In the absence of a rigorous alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a living cultural landscape. The connection between the environment, language, tradition, and community is overlooked in the application, which adopts a reductive view of heritage as isolated and static assets, rather than considering their dynamic social, cultural, and spiritual roles within the community.

Significant deficiencies arise 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, yet they are classified in the assessment as static features, neglecting their ongoing use and significance. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to appreciate the cemeteries' role in community life.

Moreover, the application does not address intangible cultural heritage elements, which include the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, resulting in a substantial oversight. Without considering these elements, the true cultural impact of the development cannot be comprehensively understood.

There are also critical issues concerning community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's credibility and does not align with the established principles regarding participation in matters that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal responsibilities to evaluate the social, cultural, and economic repercussions on the island community, thereby hindering a lawful determination of the application.

From a policy standpoint, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to assess both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from policy requirements.

In conclusion, the failure to adequately consider living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The assessment does not properly evaluate the cultural impacts of the development, nor does it provide a sufficient basis 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 assessment of seascape, landscape, and visual impacts is inadequate and does not reflect the sensitivity of the environment or the scale of change. The West Lewis coastline has an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create a dominant industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application does not represent the extent of this visual change adequately. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which undermines the assessment's reliability.

A significant deficiency is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated rather than interdependent, leading to an incomplete understanding of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This results in 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 extent 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 questions any claim of policy compliance.

Additionally, it is evident that the impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Therefore, the resulting change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

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

Particularly troubling is the reliance on undefined future measures, especially considering the sensitive nature of the receiving environment. The West Lewis coastline

is home to clean coastal waters and important habitats that are at risk from sediment disturbance and potential contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide the necessary detail on how these risks will be prevented, controlled, or monitored.

There remains considerable uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential consequences for marine species and habitats that have been identified as sensitive in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which lacks a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast, known for their diverse marine ecosystem and active fishing industry, face potential threats from the proposed development. The application fails to ensure that these habitats and livelihoods will be protected or maintained without considerable disruption.

One major issue is the underlying assumption that fishing activities can be displaced without any repercussions. The application does not provide evidence that alternative fishing grounds are available or can adequately accommodate the displaced activity. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment makes it impossible to understand the true impacts on

fisheries and local livelihoods.

Moreover, the proposal poses serious 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 expected to disturb marine life over extensive distances, notably affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate evidence to support such minimisation.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously declaring the impacts as negligible. This contradiction compromises the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly concerning anticipated harm that would necessitate legal authorisation.

Furthermore, the assessment neglects to 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 crucial to understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hinders any conclusion that the proposal signifies sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the construction of offshore turbines and associated onshore infrastructure, including cabling across protected moorland, a substation near Stornoway, and access routes through sensitive landscapes. However, the assessment of this onshore infrastructure is materially incomplete, failing to consider the full extent of impacts from what is essentially a single integrated project. The onshore works and offshore turbines are intrinsically linked yet evaluated separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Significant risks arise to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented. This results in a clear evidential gap

regarding biodiversity protection. Furthermore, the disturbance of peatland during construction releases stored carbon, potentially generating a carbon debt that contradicts the aims of renewable energy development. The application lacks sufficient discussion on this issue and fails to show that the overall carbon balance remains beneficial.

By excluding or postponing the assessment of onshore impacts, the proposal hinders proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together; however, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully understood.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights, and the application does not provide evidence that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation. Additionally, the failure to assess the project as a whole and demonstrate protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

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

TOURISM

The application fails to adequately assess the impacts on tourism, a key sector for the Isle of Lewis economy, and does not evaluate the economic and social consequences associated with this area. Tourism in the region relies heavily on its 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 provides no quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis hinders the ability to ascertain whether the proposed development would yield a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significant role of environmental quality in underpinning tourism, including the critical nature of unspoiled landscapes and dark skies for visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment only exacerbates this

inadequacy, creating a considerable gap in understanding the impacts on this recognised and growing part of the local economy.

In an island community that faces limited economic diversification, the oversight regarding tourism impacts raises broader concerns for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to exhibit net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

In summary, 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 shortcoming prevents a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment constitutes a significant omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, fails to show

that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount 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 proposal would also lead to considerable and irreversible changes to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism represent enduring consequences that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

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

Additional Comments

The island will never be the same again after this construction project.
I love where I come from and feel an affinity to the land.
It will break my heart to see the landscape spoilt.
I understand financial constraints but not at the detriment to our beautiful 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: CAE324A3

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is essential to highlight that the development's location off the west side of the Isle of Lewis is significant, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which question its compatibility with statutory requirements and national policy, as well as the principles of sustainable development.

The application presents substantial deficiencies, particularly regarding its evidential basis. A critical analysis reveals that significant environmental data is missing, while baseline information is both limited and inconsistent. Key aspects of the proposal remain undefined, and the use of a flexible design framework hampers a clear understanding of potential significant effects. Furthermore, reliance on unspecified mitigation measures raises doubts about their effectiveness. Consequently, the documentation falls short of providing a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly pronounced concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical, directly affecting the statutory tests necessary for consent and undermining the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises further concerns, with large turbines planned in close proximity to the shoreline. This positioning introduces significant issues related to landscape capacity, visual dominance, and environmental impact. Taken together, the insufficiencies in information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a complete, transparent, or trustworthy account of the probable environmental

impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to definitive turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the consistent application of a worst-case scenario. This weakens the integrity of the assessment, meaning that the impacts outlined may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to comprehend the true scope of environmental effects.

Furthermore, the application places significant dependence on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be managed at a later stage impedes any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the aims of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to determination.

There are notable evidential shortcomings as well, including gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory demands.

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

Overall, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies and fails to deliver a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data remains incomplete. The methodologies used do not adequately capture the presence, behaviour, and habitat use of various species.

Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One critical shortfall is the treatment of otters, which are a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of potential effects from construction disturbances, noise, and increased activity. This gap undermines the conclusions concerning the absence of significant effects on this species.

There are also substantial shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys that introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that show frequent use of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

The methodological weaknesses mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the real 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, given that protected species have not been properly identified or evaluated. The uncertainties introduced hinder the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, granting consent cannot be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development reveals significant methodological weaknesses and internal inconsistencies that undermine its conclusions. It is particularly concerning that the application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This area is crucial as it supports many seabird species that are already in decline, and the proposal is situated within key foraging areas and migratory pathways. However, the implications of potential displacement, collision risk, or habitat loss have not been robustly evaluated.

A critical contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects while simultaneously making a case for Habitats Regulations derogation, a process that is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the evidence presented.

Furthermore, the assessment lacks sufficient evidence regarding the seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for severely declining species, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

The decision to site turbines within a recognised migratory corridor presents an additional significant risk. This effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term implications of sustained mortality within this corridor or the potential 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 would 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 situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Moreover, the identified deficiencies represent 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 rendered unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence. These deficiencies hinder a thorough evaluation of impacts, leading to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity related to the West Lewis coastline is fundamentally lacking. It does not recognise this area as a living cultural landscape where environment, language, tradition, and community are closely interlinked. Instead, the application treats heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual relevance within the community.

One significant shortcoming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and centres of spiritual practice, yet they are categorised as static features in the assessment. This mischaracterisation ignores their continued use and meaning, as well as the impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete and fails to account for their significance in community life.

Additionally, the assessment neglects intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are entirely omitted, representing a major gap. Without addressing these factors, the cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with traits characteristic of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the assessment's legitimacy and does not align with established principles of participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of an Island Communities Impact Assessment, which is required by law under the Islands (Scotland) Act 2018. This omission means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

From a policy standpoint, these deficiencies directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly diverges from policy requirements.

Ultimately, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately evaluated, resulting in the application lacking a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the comprehensive report has not been made available. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted by the

developer's own research.

Evidence suggests that local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are not conjectural. Nonetheless, the absence of the full assessment restricts proper scrutiny of these findings, thus impairing the capacity to assess their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The non-disclosure of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when there may be effects on community character and functionality. The failure to provide the complete dataset means the application does not offer a solid evidential foundation for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, 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.

The procedural ramifications 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 constitutes a significant omission in the application, representing a failure to satisfy the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment incomplete and unreliable. 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 and undeveloped nature, conveying a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and fails to adequately reflect the scale of change or the sensitivity

of the receiving environment.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which hinders the ability to evaluate the likely environmental impacts. The project entails substantial seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be devised after consent has been granted, making it impossible to adequately assess their effectiveness or sufficiency.

This reliance on vague future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk of sediment disturbance and contamination. The application does acknowledge various risks, including sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to outline sufficient strategies for prevention, control, or monitoring of these risks.

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means that it is impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also extends to the possible effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated before consent is granted. When this information is missing, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic

impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these uses and habitats can be protected or maintained without major disruption.

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

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

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

Additionally, the assessment does not address cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not take into account the full range of impacts associated with what constitutes a single integrated project. There is an intrinsic link between the offshore turbines and the onshore works, which are assessed separately. This fragmented approach conceals the true magnitude of the environmental and socio-economic repercussions.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively; however, the separation of offshore and onshore elements results in a lack of understanding regarding the combined effects on peatlands, habitats, and local communities.

There are considerable risks to vulnerable habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not show that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a notable evidential gap in terms of biodiversity protection.

The proposal also poses concerns regarding carbon balance. Disturbance to peatland can release stored carbon, potentially leading to a carbon debt that opposes the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence that necessary consents or processes have been initiated, casting 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 is at odds with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further diminishes the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an evaluation of dark skies and nocturnal wildlife, which is a serious oversight. The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, creating a significant "wall of light" effect along the western horizon and drastically changing the night-time landscape.

Furthermore, the application does not consider the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the value of dark skies to the area and the growth of tourism sectors like astro-tourism. The neglect of these factors highlights a major flaw in the environmental assessment.

Equally important is the lack of analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any assessment of lighting impacts or studies on phototaxis, meaning it fails to address how aviation lighting may impact these species or contribute to mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been evaluated. The lack of night-time data prevents a full understanding of the ecological impacts.

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

From a policy standpoint, the absence of assessment contradicts National Planning Framework 4 regarding the preservation of natural spaces and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecosystem.

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

TOURISM

The assessment of tourism impacts presented in the application is significantly lacking, particularly in its failure to examine the economic and social repercussions for a vital

sector of the Isle of Lewis economy. Tourism, which heavily relies on the area's stunning coastline, almost untouched landscapes, dark skies, and sense of seclusion, has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite the application noting that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution from tourism.

Moreover, the application neglects to model the potential impacts of the industrialisation of the seascape and deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the area. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect this established and expanding sector.

The role of environmental quality in enhancing tourism is another critical oversight, as unspoiled landscapes and dark skies significantly contribute to the visitor experience, particularly in emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment amplifies this shortcoming, creating a considerable gap in understanding the effects on a vital and growing component of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader ramifications for employment, local enterprises, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been thoroughly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence result in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against national policy, statutory duties, and evidential standards. It echoes the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current proposal is now presented under a policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant deficiencies in the evidential basis for this application. The absence of comprehensive baseline data, the continued use of an undefined design envelope, and reliance on unspecified mitigation measures create a lack of clarity. Key impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism effects, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects or residual impacts.

Procedural shortcomings further compromise the application. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a material omission. These oversights impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal directly contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are manageable. Additionally, the lack of tourism impact modelling means a net economic benefit cannot be substantiated. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks linked to the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

I live in the westside if Lewis, I object in the following grounds:

- 1.Devastation to marine life
- 2.Slaughter of seabirds especially our protected sea eagles
- 3.Ruin the fishing especially the salmon making their way from the sea up to sporn
4. It will be detrimental to all residents health with noise during construction and from turbines. Flashing lights causing disruption.
5. The carnage while construction is in progress and irreparable damage to our unique and precious Machar.
6. Damage to tourism as no one will want to come here during construction or on completion of the project as the west coast of the island is beautiful and a great for surfing and water sports.
7. So benefit to islanders in return for all this upheaval in the form with cheaper electricity or compensation to individuals instead of community groups.
8. On point 7, no compensation will make up for what we will lose.
9. Huge risk of ploution as 60 +turbines full of oil and other contaminants.
10. Damage to our unique couture and what a legacy we are leaving our children and grandchildren with 60+ rotting, rusty turbines at the end of their useful life.
11. Who will be responsible for the ongoing protection of our coastline when Northland Power will have fucked off to Canada with their loot

THE END

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: 5C1D4234

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which fundamentally challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided for the proposed development overlooks vital aspects of cultural heritage and community identity, particularly in relation to the West Lewis

coastline. This area embodies a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these dynamic relationships, the application reduces heritage to a collection of static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming in the assessment is its treatment of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries serve as active sites of burial and spiritual practice, yet they are presented as static features, disregarding their continued use and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks the role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship that the community has with the coastal environment. These elements are critical to the area's identity but are completely missing from the assessment, indicating a significant oversight. Without acknowledging these factors, the full cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised under the characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters that affect cultural and environmental interests.

Additionally, there is a critical procedural flaw due to the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination of the application.

From a policy standpoint, these oversights create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, and the recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and the necessary statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer remains unpublished, leading to a significant evidential gap. This lack of transparency not only inhibits the public's understanding but also hinders the competent authority's ability to fully assess the social risks identified through the developer's own engagement with local residents. Summaries suggest that community members are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings are drawn from direct community engagement, which underscores their relevance and validity. However, without the complete assessment, proper scrutiny of these impacts is not possible, limiting the determination of their significance within the overall decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with references to "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been adequately considered or given sufficient weight in the application. The omission of the full Social Impact Assessment obscures the genuine human and social costs associated with the development, undermining the integrity of the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this scale, particularly in relation to community character and functioning.

From a policy standpoint, the application fails to align with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence currently available points to adverse effects that have not been disclosed. Without the full assessment, it is impossible to demonstrate compliance with these policy requirements.

The procedural implications are substantial. The competent authority is unable to conduct a comprehensive socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application, failing to meet the evidential standards set by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, combined with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable, ultimately preventing a lawful determination and underscoring that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding the impacts on seascape, landscape, and visual aspects is significantly inadequate, failing to accurately depict both the extent of the changes and the sensitivity of the environment being affected. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shoreline would introduce a continuous and prominent industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently convey the magnitude of the visual

changes anticipated. The turbines' scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thus directly affecting visual amenity and diminishing the fundamental qualities of naturalness and remoteness. The current assessment fails to accurately reflect this level of impact or its significance within the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and landscapes of high value. This suggests that the scale of visual impact may have been understated, calling into question the assessment's reliability.

Another critical shortcoming is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, failing to acknowledge 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 relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This situation represents not merely a visual impact but encompasses broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The magnitude of change is at odds with the requirement to preserve 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. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Thus, the resulting change is fundamentally permanent and not susceptible to reduction to an acceptable level through mitigation.

In summary, the assessment does not accurately reflect the extent of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding the assessment of construction and pollution risks, making it impossible to properly evaluate the potential environmental

effects. Significant seabed preparation and installation works are planned for a high-energy Atlantic environment; however, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is incomplete and does not adequately consider the full range of impacts from what is a unified project. The offshore turbines and onshore works are interconnected; however, they are assessed separately, leading to a fragmented view that obscures the true extent of environmental and socio-economic effects.

Onshore components include cabling through protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavating areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires that all elements of a project are evaluated together. However, the division of onshore and offshore components means the combined effects on peatlands, habitats, and local communities are not fully grasped.

There are significant risks posed to sensitive habitats, such as machair systems and peatland areas, which are protected by policy. The application does not provide evidence that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a clear gap in relation to biodiversity protection.

The proposal also raises issues regarding carbon balance. Disturbance of peatland releases carbon that has been stored, potentially creating a carbon debt that contradicts renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application does not offer evidence that necessary consents or processes have been initiated, raising doubts about its deliverability and lawful implementation.

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

Collectively, the separation of project components, the lack of comprehensive assessment, and insufficient evidence regarding 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 West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive “wall of light” effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions directly conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as night-time character is an integral part of the environment.

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

TOURISM

The assessment concerning tourism impacts associated with the proposed development is critically inadequate and neglects to evaluate the economic and social repercussions 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 has experienced notable growth 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. Although the application indicates that 86% of visitors are attracted by the scenery, it

lacks a quantified assessment of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or overall economic contributions.

Furthermore, the application does not analyse how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear whether the proposed development would bring about a net economic benefit or threaten an established and growing sector. The failure to take into account the significance of environmental quality in supporting tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and the growth of nature-based and astro-tourism markets, exacerbates this issue. Additionally, the lack of a Dark Skies Assessment results in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the omission of tourism impact assessments has far-reaching 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 evaluated as required by the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic dependency of the island create a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: AA957276

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 founded on an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. Situated off the west side of the Isle of Lewis, the location is characterised by its Atlantic-facing coastline, a nearly untouched environment, and a strong cultural identity. The scale, design, and proximity of the proposal raise crucial questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework used obscures a clear understanding of potential significant effects, while the proposed mitigation measures, which have not been detailed, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

There are evident and significant conflicts with existing policies. The proposal shows inconsistency with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity can be achieved. These conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The scale of the proposed development is unprecedented for this area, featuring large turbines situated near the shoreline, which introduces substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a full and reliable account of the potential environmental consequences of the proposal. There are significant evidential deficiencies, including gaps in baseline data and a reliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are suggested without robust supporting data. This lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Moreover, the application's heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined is troubling. Seeking consent on the basis that environmental harm will be addressed later prevents any meaningful evaluation of the effectiveness of these measures and obstructs the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination.

The undefined Project Design Envelope compounds these issues by introducing uncertainty regarding specific turbine dimensions, layouts, and configurations. This lack of commitment prevents a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the final development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Together, these factors mean that the application does not satisfy the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to comply with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been fully assessed or appropriate safeguards established.

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

ASSESSMENT OF ALTERNATIVES

The application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. There is a lack of transparent and evidence-based comparisons

regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the design has not been mitigated by proper planning, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority from determining whether less harmful and more appropriate alternatives are available. Without a thorough assessment of alternatives, it cannot be asserted that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive 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 available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

A notable shortcoming is the inadequate recognition of otters, classified as a European Protected Species. The application does not effectively assess their active utilisation of coastal regions for foraging and movement. This oversight in considering their core foraging range and behavioural tendencies means that potential impacts from construction disturbances, noise, and increased human activity have not been properly evaluated, undermining claims regarding the lack of significant effects on this species.

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due to reliance on aerial surveys, which are prone to significant detection bias under

Atlantic conditions. This approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological deficiencies imply that assertions of negligible or non-significant effects are based on assumptions rather than substantiated evidence. The absence of adequate baseline data also hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. 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 solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the application is significantly flawed, with considerable gaps in evidence and internal inconsistencies undermining its conclusions. Notably, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. It is situated within key foraging areas and migratory pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A fundamental contradiction arises in the application where the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not adequately supported by the underlying evidence. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to

underestimate mortality, especially in areas where baseline data is lacking and behavioural responses remain poorly understood.

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

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

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and inadequate evidence. These deficiencies obstruct a thorough evaluation of impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage surrounding the West Lewis coastline is fundamentally insufficient, failing to acknowledge the area as a dynamic cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts an overly simplistic view, treating heritage as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual roles within the community.

Notably, the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, reveals a critical shortcoming. These sites serve as active places of burial and spiritual engagement, yet the assessment categorises them merely as static features. This oversight neglects their continued use and significance, as well as the implications of development on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their importance in community life.

Moreover, the application neglects to address intangible aspects of cultural heritage, such as the Gaelic language, traditional practices, and the enduring connection between the community and the coastal environment. These factors are vital to the area's identity but are conspicuously absent from the assessment, marking a significant omission. The absence of these considerations hinders a full understanding

of the development's cultural impact.

Concerns extend to community rights and engagement, particularly with the Gaelic-speaking population, which possesses a unique cultural identity recognised as characteristic of Indigenous Peoples. The lack of a Free, Prior and Informed Consent process further undermines the credibility of the assessment, failing to align with established principles of participation regarding decisions that affect cultural and environmental interests.

Additionally, a critical procedural failure is evident in the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to examine the social, cultural, and economic effects on the island community, thus rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal in direct contradiction to National Planning Framework 4, specifically concerning the protection of historic assets and locations. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and legal obligations creates a considerable evidential gap. The cultural impacts associated with the development remain inadequately assessed, leaving the application lacking a solid foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and fails to provide the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the complete report has not been made available. This represents a critical evidential gap, hindering both public understanding and the competent authority's grasp of the full range of social risks identified through the developer's own research.

Summaries that are available suggest that residents are already experiencing quantifiable stress, anxiety, and concern due to the scale and proximity of the proposal. These issues arise from direct engagement and are therefore factual. However, the inability to disclose the entire assessment prevents adequate scrutiny of the findings and restricts the capacity to ascertain their significance within the decision-making framework.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been fully incorporated into the primary

application or given sufficient consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function may be jeopardised. By failing to provide the comprehensive data, the application does not offer a complete evidential basis for evaluating the balance between potential benefits and detriments.

From a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and avoid causing harm, yet the evidence currently available points to existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications 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 constitutes a material omission within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse effects, renders the assessment incomplete and unreliable. This situation impedes a lawful determination and supports the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The introduction of large-scale turbines in such close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the scale of this change and the sensitivity of the receiving environment.

The magnitude of visual change resulting from the proposed turbines is inadequately represented in the application. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, which would directly affect visual amenity and degrade the defining qualities of naturalness and remoteness. The assessment does not convey the level of impact or its significance in relation to such a sensitive landscape.

Moreover, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not

effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important connections, altering the experience of heritage assets and disrupting their relationship to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been properly considered in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change presented is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The changes they would bring about are fundamental and permanent, rather than reducible to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately capture the scale of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with protecting this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

This reliance on undefined measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters

and significant habitats that are susceptible to sediment disruption and pollution. While the application acknowledges the risks associated with sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are established to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot occur. Additionally, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of comprehensive management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the current application does not adequately protect these vital habitats or activities, nor does it provide a thorough assessment of the ecological and socio-economic impacts.

A major concern is the assumption that fishing can be relocated without any negative effects. The application lacks evidence showing that alternative fishing grounds are available and can handle additional strain. This is a crucial gap, as displacing fishing activities could lead to overfishing in other areas and harm the local fishing economy. Without a solid, evidence-based evaluation, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposed development also poses serious risks to marine life, especially due to the

underwater noise produced during construction. Extended periods of high-energy hammer piling are expected to disturb marine species over large distances, particularly dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise the importance of these disturbances without adequate supporting evidence.

There exists a clear contradiction within the application regarding the need for licenses to harm European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially when anticipated harm might necessitate legal permissions.

Furthermore, the assessment fails to address cumulative impacts that arise from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of demonstrating that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion regarding its sustainability.

In summary, the lack of evidence concerning fishing displacement, the downplay of acoustic impacts, and internal contradictions 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 full scope of impacts associated with the entire project, which includes both offshore turbines and onshore infrastructure. By treating these components separately, it obscures the true scale of the environmental and socio-economic effects. Significant onshore activities involve the installation of cabling across protected moorland and the construction of a substation near Stornoway, with associated access routes through sensitive landscapes. These operations necessitate excavation in areas of deep peat, particularly within Barvas Moor, a habitat crucial for carbon storage and ecological balance. The lack of a comprehensive assessment of these impacts hampers understanding of the project's overall environmental footprint.

Furthermore, the failure to consider onshore impacts in conjunction with offshore elements prevents a full evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together, yet the division of assessments means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood. This situation poses significant risks to sensitive ecosystems, including machair systems and peatland

environments, which are protected by policy. There is insufficient evidence in the application to confirm that impacts on these habitats have been thoroughly evaluated or that effective avoidance strategies have been implemented, revealing a troubling gap in biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this critical issue or confirm that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land could lead to conflicts with established land use and legal rights. The application lacks evidence that the necessary consents or processes for such land use changes have been initiated, raising concerns about the feasibility and lawful execution of the project.

From a policy standpoint, the incomplete assessment of the project as a whole, coupled with the failure to safeguard peatlands, habitats, and land use interests, contravenes guidelines outlined in the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated significantly undermines the application's credibility.

In summary, the disjointed approach to assessing project components, the absence of a thorough evaluation, and the lack of substantiating evidence regarding environmental and land use impacts render this segment of the application both incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive “wall of light” effect across the western horizon. This significant change not only impacts visual amenity but also poses a severe risk to the area’s cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation

from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

In sum, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

TOURISM

The assessment of tourism impacts in the application is inadequate and overlooks the economic and social effects on a vital part of the Isle of Lewis economy. Tourism is heavily reliant on the island's natural features, such as its wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no analysis provided to quantify how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution from tourism.

The economic significance of tourism is notable, with growth from £65 million in 2017 to over £81.5 million, alongside the support of more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to forecast the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this evaluation, it remains unclear if the development would yield a net economic advantage or disrupt a well-established and expanding sector.

Additionally, the assessment does not address the significance of environmental quality for tourism. This includes the crucial role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a critical gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact

Assessment means that these economic risks have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy viewpoint, the application does not meet the standards of the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It is at odds with strategic goals that recognise tourism as a priority growth area and fails to provide enough evidence for the competent authority to evaluate the economic effects of the proposal.

In conclusion, the combination of the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the oversight of the island's economic reliance on tourism leads to a significant evidential gap. This gap hinders a thorough assessment of the economic repercussions and indicates 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: 166F54D5

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies related to planning, environmental considerations, cultural implications, and procedural adherence. The development is set to be located off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the wind farm, which raise fundamental questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and numerous aspects of the proposal are left undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures means that their effectiveness remains unassessed. Consequently, the documentation falls short of providing a comprehensive or informed perspective on the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by robust evidence.

Moreover, there are evident and substantive policy inconsistencies. The proposal appears to conflict with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It fails to establish that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These inconsistencies directly challenge the statutory tests necessary for consent and jeopardise the ability of the relevant authority to determine that the development aligns with policy criteria.

The scale of the project is unprecedented for this area, with large turbines to be located in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual impact, and environmental ramifications. Collectively, the lack of adequate information, the reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to reliably account for the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development. Consequently, this situation prevents both the public and the competent authority from gaining a true understanding of the environmental consequences.

Furthermore, the application is heavily dependent 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 at a later stage inhibits any meaningful evaluation of these measures' effectiveness or the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and undermines the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and necessary mitigation must be established clearly before determination.

There are significant evidential shortcomings, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This generates uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be confirmed that impacts have been fully assessed or that appropriate safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The 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 proposed application presents a significant deficiency in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A notable gap exists in the consideration of otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to account for their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbance, noise, and increased activity, ultimately undermining any conclusions regarding significant effects on this species.

Additionally, the evaluation of basking sharks is deficient due to an overreliance on aerial surveys, which introduces a significant detection bias, particularly under Atlantic

conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The neglect to incorporate or appropriately consider such data leads to an incomplete baseline, weakening the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variation and broader ecosystem interactions. This uncertainty raises concerns about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced means that adverse effects cannot be reasonably excluded, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the development, yet the assessment does not thoroughly evaluate risks related to displacement, collision, or habitat loss.

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

The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in

severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have the potential effects 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, data gaps, and modelling flaws means that the required standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and renders the conclusion in support of consent unlawful.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is not adequate. It does not recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are connected. The application takes a simplistic approach, viewing heritage as isolated, static assets instead of understanding their ongoing social, cultural, and spiritual roles in the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These places serve as active sites for burial and spiritual practices, yet the assessment classifies them as unchanging features, overlooking their current use and significance, as well as the development's effect on their setting. This misunderstanding leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

The application also neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely missing from the assessment, which is a major oversight. Without considering these factors, it is impossible to fully understand the cultural impact of the

development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement weakens the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure in the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone prevents a lawful decision.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, deviates from policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application suffers from a significant lack of transparency regarding social impacts, health, and wellbeing, which undermines its validity. The developer has conducted a Social Impact Assessment that involved focus groups with local residents, but the complete report remains unpublished. This failure to disclose the full assessment creates a notable evidential gap, hindering both public understanding and the competent authority's ability to assess the identified social risks thoroughly.

Residents are already reporting measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts have been gathered through direct engagement and should not be dismissed as speculative. Nonetheless, the absence of the full assessment limits scrutiny of the findings, thereby affecting their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with the developer's own research highlighting the risk of "cultural loss." Despite this alarming insight, such impacts have not been adequately reflected in the main application, nor have they been afforded the weight they merit. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of openness further compromises the Environmental Impact Assessment process. A thorough understanding of 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 entire dataset leaves the application lacking 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 regarding health and wellbeing. It is essential for developments to foster positive health outcomes and avoid detrimental effects, yet the evidence presented indicates existing adverse impacts that remain unaddressed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are noteworthy. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission represents a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of adverse effects already being felt by the community, leaves the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is inadequate and does not truly capture the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a significant sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible alteration of the landscape.

The application fails to properly depict the degree of visual change that would occur. Due to their scale and proximity, the turbines would overshadow 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 level of impact or its importance within such a sensitive landscape context.

Methodological issues arise concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact may have been underestimated, thereby casting doubt on the assessment's reliability.

Additionally, there is a failure to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment fails to acknowledge this interdependence, treating these heritage assets as isolated, which leads to an incomplete understanding of their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This constitutes not only a visual impact but also a significant cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural spaces and historical assets. The magnitude of change is incompatible with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertions of policy compliance.

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

In summary, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interrelatedness 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 entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This insufficiency hinders a thorough assessment of potential environmental effects, relying instead on unspecified mitigation and contingency measures to be developed after consent, which prevents a meaningful evaluation of their sufficiency.

Particularly alarming is the absence of detailed emergency response procedures, which exacerbates concerns about environmental protection. By postponing contingency planning until after consent, the application hinders the ability to assess whether adequate safeguards are in place for pollution incidents, introducing procedural risks that compromise the competent authority's evaluation of environmental measures at the determination stage.

The coastline of West Lewis is known for its clean coastal waters and vital habitats,

which are at risk of disturbance and contamination. While the application acknowledges hazards such as sediment mobilisation and accidental spills, it does not present enough information on prevention, control, or monitoring strategies. Furthermore, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations complicates the assessment. Without robust modelling and clearly articulated management approaches, the ecological effects, duration, and extent of these impacts cannot be accurately determined.

From a regulatory viewpoint, the lack of defined mitigation measures and detailed management strategies raises serious concerns about compliance with the Environmental Impact Assessment regime. The assessment of significant effects and mitigation must occur before consent, and absent this information, a lawful determination becomes unattainable. Collectively, these deficiencies render the assessment materially inadequate, obstructing a thorough review of construction and pollution risks, and further affirm the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The local waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry; however, the application does not convincingly demonstrate how these habitats and activities can be protected or preserved without causing significant disruption.

One major concern is the assumption that fishing activities can be relocated without negative effects. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the added pressure. This gap in the assessment is crucial, as displacing fishing efforts could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. The lack of a clear, evidence-based assessment hampers the understanding of impacts on fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over extended periods is likely to disturb marine life over large areas, particularly species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises pressing concerns, yet the application minimizes these effects without providing adequate supporting evidence.

The application also presents a contradiction regarding the need for licences to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts that arise

from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to 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 establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus 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 in the application culminate in an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the onshore works, yet these components are evaluated in isolation. This fragmented assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

Moreover, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policies. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a concerning evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that

contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting is visible over long distances and represents a significant change to the area's visual amenity and landscape character. However, the Environmental Impact Assessment fails to evaluate the impact of this lighting, which is a material omission given the importance of dark skies to the identity of the West Lewis coastline and its emerging tourism sectors, including astro-tourism.

Furthermore, the absence of any assessment regarding nocturnal wildlife is particularly concerning. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase their risk of collision. Despite this, the application does not provide any lighting impact assessment or phototaxis study to evaluate how the proposed aviation lighting may affect these vulnerable species or lead to increased mortality rates.

The ornithological assessment relies solely on daytime survey data, which fails to account for nocturnal activity and the associated risks for species like Kittiwakes that may forage or migrate at night. This lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of these 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 cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, the omission of these assessments contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis results in an incomplete application that is incapable of supporting a lawful determination.

TOURISM

The application presents a substantial lack of assessment regarding the impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application does not quantify how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contributions.

In recent years, tourism has seen notable growth, increasing from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application fails to model the potential consequences of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added and broader economic resilience. Without such crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an already established and thriving sector.

Furthermore, the assessment neglects the significance of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies are essential to visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a considerable gap in understanding the impacts on a growing segment of the local economy.

Given the limited economic diversification within the island community, the failure to evaluate tourism impacts carries broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately addressed, contravening the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity of evidencing net benefit. It conflicts with strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and acknowledge the island's economic dependency creates a significant evidential gap. This inadequacy hinders a thorough evaluation of economic effects and contributes to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant procedural and evidential deficiencies that render it unfit for determination. It fails to meet the requirements of sustainable development as mandated by statutory duties and national policy. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a complete or reliable evidential basis for assessment.

Critical gaps exist in the baseline data, and the continued use of an undefined design envelope raises further concerns. Additionally, there is an overreliance on unspecified mitigation measures, as well as the omission of significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, lacking the depth required to fully understand likely significant effects or residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the comprehensive Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues alone are substantial enough to deem the application unsuitable for consideration.

In terms of national policy alignment, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been sufficiently addressed, nor has there been any evidence of net economic benefits, particularly given the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled,

invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application suffers from extensive information deficiencies, policy conflicts, and unresolved environmental risks, rendering it procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or utilise the appropriate regulatory measures to demand the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

Having been born and brought up on the West side of Lewis, I can't begin to articulate the massive negative impact these wind turbines will have. People in Lewis are connected to the land. It is part of our identity, culture and history. The complete disregard for locals in this has been astonishing.

It breaks my heart looking at what the untouched coastline of Lewis is potentially going to look like should these turbines be constructed. Our land changed forever, disrupted forever.

The scenery of the island's most beautifully natural landscapes will be ruined by these manmade structures, on a scale so large I can't begin to wrap my head around it. The West coast of Lewis remains one of the world's most natural, untouched havens and the sheer scale of this project would completely spoil that. The land is part of the people here. It is criminal to me that such natural beauty can just completely be disregarded like this, just heartbreaking.

I am not opposed to renewable energy in the slightest, a big advocate in many areas. However, the sheer scale of this project is completely disproportionate.

The coastline on the west side of Lewis brings thousands of tourists in every year. This would have a detrimental impact on these figures.

I am no scientist but from what I hear this would also have a detrimental effect on the marine wildlife of the area.

If there was going to be massive community compensation there would be more of an argument but even in this area, it is just a Canadian firm profiting off the local council's mistakes. How is this fair for the people? They deserve better. There's no evidence for what effect this will have on the people living in the area health wise either. We are being treated as guinea pigs and I just don't understand how this can be fair. I am completely opposed to this disproportionate proposal and can only wish the people at the head of it would take the time to get to know the locals of the area and see what the land means to them. Our land is not for sale. The community is not for this. It is completely unfair and disgrace to nature.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 5C04EA81

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which is currently under marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents, highlighting deficiencies in planning, environmental aspects, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area with a coastline facing the Atlantic, known for its near-pristine environment and strong cultural heritage.

Concerns arise due to the unprecedented scale of the proposal, which features large turbines placed close to the shoreline. This positioning raises significant issues related to landscape capacity, visual impact, and overall environmental effects. The application lacks a solid evidential foundation for lawful determination, missing critical environmental data, while baseline information is often inconsistent or insufficient. Many key aspects of the proposal remain unclear, and the flexible design framework obstructs a comprehensive understanding of potential significant effects. Furthermore, the proposal relies on unspecified mitigation measures, rendering it impossible to assess their effectiveness. As a result, the available documentation does not provide a thorough understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack strong evidential support.

Substantive policy conflicts exist, with the proposal appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly impact the statutory tests for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable evaluation of the likely environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific

turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hampers the ability to apply a worst-case scenario consistently. Such an approach undermines the integrity of the assessment, meaning that the impacts presented may not truly reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the actual extent of the environmental effects.

Furthermore, the application relies extensively on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Consent is sought on the premise that any environmental harm will be mitigated at a later stage. This deferral prevents any meaningful evaluation of the effectiveness of those measures and hinders the assessment of residual impacts. It is procedurally unacceptable to postpone key information until post-consent stages, as this contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

In addition to the above issues, there are notable evidential deficiencies within the assessment, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of 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, creating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to adequately assess impacts or ensure that appropriate safeguards are in place for biodiversity protection and environmental integrity.

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

ASSESSMENT OF ALTERNATIVES

The application is fundamentally flawed in its assessment of alternatives, failing to adhere to the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative that recounts the project's evolution. This method does not sufficiently demonstrate that less

harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not illustrate that the developer has meaningfully considered the possibility of placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline, coupled with the critical role of proximity to shore in determining impacts, makes the absence of such an analysis particularly significant. This shortcoming inhibits any conclusion that the proposed siting is the least damaging option available.

These deficiencies also extend to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate a failure to apply mitigation by design, leading instead to an over-reliance on post-design mitigation measures.

Consequently, the application does not effectively demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether less harmful and more suitable alternatives exist. Without a thorough alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overall finding that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. The assessment of marine ecology and protected species fails to provide a complete or reliable understanding of ecological receptors in this area. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A significant omission is the failure to properly recognise and assess otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not adequately consider their core foraging range and behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed, undermining any

conclusions about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment regarding the proposed development is fundamentally flawed, displaying significant internal inconsistencies and gaps in evidence that undermine its conclusions. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the necessary evidential standards. The location of the development within critical foraging areas and migratory pathways raises serious concerns, yet the assessment lacks a robust evaluation of potential impacts such as displacement, collision risks, and habitat loss.

A notable contradiction arises in the application where the developer claims no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only necessary in instances where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by 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. The significance of these feeding areas is not thoroughly considered, and the reliance

on modelling techniques introduces uncertainty, particularly for species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies used may underestimate mortality rates, especially when baseline data is insufficient and behavioural responses are not fully understood.

The placement of turbines within a recognized migratory corridor poses an additional and considerable risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application fails to appropriately assess the long-term consequences of ongoing mortality within this corridor and the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory findings, together with data deficiencies and limitations in the modelling approach, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thus precluding a lawful conclusion that would support consent.

The shortcomings identified also indicate a failure to comply with 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 places the proposal in direct conflict with national policy. Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies obstruct a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where environment, language, tradition, and community are interconnected. However, the assessment adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

One major oversight is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places for burial and spiritual practice, yet they are mischaracterised as static features, neglecting their continued use and significance. This lack of understanding diminishes the evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These elements are fundamental to the area's identity but have been completely omitted, which is a considerable shortcoming. The absence of these factors leads to an incomplete understanding of the cultural impacts of the

development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as Indigenous People, has a unique cultural identity. Yet, no process of Free, Prior and Informed Consent has been implemented, which undermines the assessment's legitimacy and fails to adhere to established participation principles regarding decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community, resulting in an unlawful determination.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices constitutes a significant departure from policy requirements.

In summary, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been sufficiently assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing associated with the proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made publicly available. This absence represents a substantial evidential gap that inhibits both public understanding and the competent authority's ability to ascertain the full range of social risks identified in the developer's research.

Residents have expressed measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development, as evidenced by direct engagement with the community. However, the lack of access to the full assessment hampers proper scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process. Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting a potential "cultural loss." Notably, these impacts have not been adequately addressed within the main application, nor have they been assigned appropriate weight, thereby obscuring the genuine human and social costs associated with the development.

The absence of transparency fundamentally undermines the Environmental Impact

Assessment process. A comprehensive understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality may be jeopardised. By failing to provide the complete dataset, the application lacks a thorough evidential basis necessary for weighing the benefits against the potential harms.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Development must not only support positive health outcomes but also mitigate harm. The evidence currently available indicates existing adverse effects that have not been fully disclosed, rendering it impossible to demonstrate compliance with this policy without the full assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This deficiency obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment fails to adequately represent the magnitude of visual change resulting from the proposed large-scale turbines along the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of such turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering the coastal character and leading to a permanent transformation of the landscape.

The proposed development would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Furthermore, there are significant methodological concerns regarding the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of the visual impact, thereby undermining the assessment's reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between seascape, landscape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape setting, interconnected visually and spatially with the Atlantic horizon.

Treating these sites as isolated assets fails to recognise their interdependence and results in an incomplete evaluation of the impacts on their settings and cultural significance. The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately addressed within the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which emphasises the importance of protecting natural places and historic assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any claims of compliance with policy requirements.

Moreover, 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, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation efforts. Overall, the assessment does not accurately capture the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and strongly indicate that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, leaving critical details lacking for evaluating the likely environmental effects. Substantial seabed preparation and installation works will take place within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially alarming, given the sensitivity 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. Although the application acknowledges risks associated with sediment mobilisation and potential accidental chemical or oil spills, it lacks 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 in place, 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 identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application restricts the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation need to be assessed prior to consent, and when such information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposed development poses serious risks to marine life and the fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector. However, the application does not adequately demonstrate how these habitats and uses will be protected from significant disruption.

A major concern is the assumption that fishing activities can be shifted without negative consequences. The application lacks evidence to show that alternative fishing grounds exist, are accessible, or can handle the additional pressures of displaced fishing. This gap in information is critical, as forcing displacement could lead to overfishing in other areas and have detrimental economic impacts on the local fishing fleet. Without a solid, evidence-based evaluation, the repercussions for fisheries and livelihoods remain unclear.

Moreover, the project poses considerable threats to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is anticipated to disturb marine life across extensive areas, particularly affecting dolphins. The expected disruption to a significant portion of the local bottlenose dolphin population raises substantial worries, yet the application minimises these effects without adequate evidence.

There is also a notable inconsistency within the application that acknowledges the necessity for licences to allow harm to European Protected Species while concurrently claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and brings up concerns about adherence to the Habitats Regulations, especially where anticipated harm may require legal authorisation.

Additionally, the assessment does not take into account the cumulative impacts of various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the absence of evidence regarding fishing displacement, underestimation of noise impacts, and internal contradictions make the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure, which consists of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These works involve excavation across areas of deep peat, particularly within Barvas Moor, a critical carbon store and ecologically sensitive habitat. However, the assessment of these onshore elements is materially incomplete, leading to a fragmented approach that obscures the true scale of environmental and socio-economic impacts associated with what is, in fact, a single integrated project.

The application fails to consider the combined effects of the offshore turbines and the onshore works, thus preventing a full understanding of the project's overall environmental footprint. The separation of the assessments for offshore and onshore components means that cumulative effects on peatlands, habitats, and communities are not adequately evaluated. Furthermore, the application does not sufficiently demonstrate that sensitive habitats, including machair systems and peatland environments, have been fully assessed or that appropriate avoidance measures have been applied. This gap raises serious concerns regarding biodiversity protection.

There are additional concerns surrounding carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The proposal does not address this issue in a satisfactory manner, nor does it demonstrate that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises serious questions regarding the deliverability and lawful implementation of the project.

From a policy perspective, the failure to conduct a holistic assessment of the project, alongside the lack of demonstrated protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any consideration of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposed development would install permanent red aviation lighting that would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, the proposal does not address the effects of artificial lighting on nocturnal wildlife. Species such as 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 a phototaxis study means that the potential effects of aviation lighting on these species, and the associated mortality risk, have not been evaluated.

Compounding this issue, the ornithological assessment relies solely on daytime survey data, failing to account for nocturnal activity 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 assessed. The lack of site-specific night-time data results in a critical deficiency in understanding the ecological impacts of the proposal.

Without an evaluation 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 has not been met, invoking the precautionary principle and preventing a lawful determination of the application.

From a policy standpoint, this omission contradicts the aims of National Planning Framework 4 concerning the safeguarding of natural places and environmental quality.

It also detracts from the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the ecosystem.

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a substantial 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 Isle of Lewis economy is heavily reliant on tourism, which has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment of tourism impacts in the application is materially deficient, failing to evaluate the economic and social consequences for this key sector. Although the application acknowledges that 86% of visitors are attracted by the area's scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure could impact visitor numbers, behaviour, or overall economic contribution.

The industrialisation of the seascape and potential loss of environmental quality are not modelled in terms of their effects on Tourism Gross Value Added or the wider economic resilience of the island. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or threaten an established and growing sector. The assessment further neglects to consider the role of environmental quality, particularly the significance of unspoiled landscapes and dark skies to visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on a crucial and expanding aspect of the local economy.

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

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4, particularly regarding economic impact and the necessity of showing net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

The cumulative effect of the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This inadequacy hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm 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

The impact on the Island as a whole would be totally catastrophic

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: C89A7059

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment requirements. It is founded on a review of the Environmental Impact Assessment Report and related documents, highlighting 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 renowned 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 shore, raises serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework obstructs a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are evident and substantial policy conflicts associated with the proposal. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal raises further concerns, with large turbines positioned near the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, marked by notable gaps in baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially in instances where conclusions of negligible or non-significant effects are stated without robust supporting data. A lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

The Environmental Impact Assessment Report is fundamentally deficient and fails to provide a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not correspond to the development ultimately realised, thus hindering both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that are not yet defined. Consent is sought under the premise that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established before determination.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority lacks the necessary basis to determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development lacks a credible assessment of marine ecology and protected species, which is essential for understanding the ecological receptors in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is insufficient. The methodologies used in the

assessment fail to accurately identify and evaluate the presence, behaviour, and habitat usage of key species, leading to a weak evidential basis for impact evaluation.

Particularly concerning is the omission of otters, which are classified as a European Protected Species. The application does not adequately address their foraging and movement within coastal regions. Without a proper assessment of their core foraging range and behavioural patterns, the potential impacts from construction disturbance, noise, and increased activity are not sufficiently considered. This oversight severely undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks exhibits significant deficiencies, as it relies heavily on aerial surveys that introduce bias, especially under Atlantic conditions. This method is likely to underestimate their presence when compared with established land-based observations that indicate their frequent use of these waters. The neglect to include or adequately consider this data further compounds the incomplete baseline, diminishing the reliability of the conclusions reached.

The methodological shortcomings mean that any assertions of negligible or non-significant effects rely more on assumptions than on solid evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty concerning the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted. The resulting uncertainty means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions makes 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 does not rest on a solid evidential foundation.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented fails to adequately reflect the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, which would fundamentally alter this unique character, resulting in a permanent and irreversible transformation of the landscape.

The proposal inadequately represents the magnitude of visual change. Given the scale

and proximity of the turbines, they would overwhelmingly dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity, significantly eroding the qualities of naturalness and remoteness. The assessment does not effectively convey the true level of impact or its significance within such a sensitive landscape.

Methodological flaws also arise concerning 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 concerns that the visual impact magnitude has been understated, thus compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Prominent sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape setting that is visually and spatially linked to the Atlantic horizon. By treating these as isolated assets, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the requirements to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further calls into question the proposal's compliance with policy.

It is also evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Consequently, the resultant change is fundamental and permanent, incapable of being 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 interconnected nature of landscape and heritage. These deficiencies undermine the reliability of the evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

TOURISM

The assessment of the tourism impacts is inadequate and does not evaluate the economic and social consequences for an important sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched

landscape, dark skies, and sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application fails to model the impact of industrialisation on the seascape and the loss of environmental quality on Tourism Gross Value Added or overall economic resilience. This lack of analysis means it is impossible to determine whether the development would provide a net economic benefit or harm a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies for visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, leaving a major gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and community sustainability. The failure to conduct a proper Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

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

Overall, the inability to quantify tourism impacts, assess environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant procedural and evidential deficiencies that render it unfit for determination. It fails to meet the requirements of sustainable development as mandated by statutory duties and national policy. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a complete or reliable evidential basis for

assessment.

Critical gaps exist in the baseline data, and the continued use of an undefined design envelope raises further concerns. Additionally, there is an overreliance on unspecified mitigation measures, as well as the omission of significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, lacking the depth required to fully understand likely significant effects or residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the comprehensive Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues alone are substantial enough to deem the application unsuitable for consideration.

In terms of national policy alignment, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been sufficiently addressed, nor has there been any evidence of net economic benefits, particularly given the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application suffers from extensive information deficiencies, policy conflicts, and unresolved environmental risks, rendering it procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or utilise the appropriate regulatory measures to demand the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I am worried that this project will impact my mental health.
It will change the whole area of west lewis

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6AE5993C

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 frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. The scale, design, and proximity of the development raise essential issues concerning its alignment with statutory obligations, national policy directives, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful assessment. Important environmental data is absent, baseline information is either limited or inconsistent, and numerous critical aspects of the proposal remain undefined. The proposal's flexible design framework obscures a clear understanding of the potential significant effects, and reliance on unspecified mitigation measures means their anticipated effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are evident and substantial conflicts with policy frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate that it can fulfil national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent and hinder the competent authority's ability to determine the development's policy acceptability.

The unprecedented scale of the proposal, involving the installation of large turbines in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle is applicable.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and completeness. A flexible Project Design Envelope is employed, lacking firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to consistently apply a worst-case scenario, which is essential for a credible assessment. Consequently, the impacts detailed may not accurately represent those of the development that would eventually be constructed, limiting both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these circumstances defers critical information to stages post-consent, making it impossible to evaluate the effectiveness of these measures or assess residual impacts meaningfully. This procedural approach is unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and appropriate mitigations are clarified before any determination can be made.

Evidential shortcomings also permeate the assessment, with notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. Insufficient information precludes a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As such, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively assessed or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority without the necessary information to make a well-informed determination regarding the application.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is seriously lacking. It overlooks the West Lewis coastline as a vibrant cultural landscape where community, language, tradition, and environment are interconnected. The application reduces heritage to mere static assets and fails to recognise their ongoing social, cultural, and

spiritual significance within the community.

Culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are mischaracterised. These sites serve as active places for burial and spiritual practice, yet they are treated as unchanging features. This oversight fails to take into account their continued use and the effects of development on their environment. As a result, the evaluation of cultural impacts is incomplete, neglecting their vital role in community life.

Moreover, the assessment does not address intangible cultural heritage. Key elements like the Gaelic language, traditions, and the community's enduring relationship with the coastal landscape are crucial to the area's identity but are notably absent from the assessment. This omission hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of engagement calls into question the validity of the assessment and ignores established principles of participation in matters affecting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination unlawful.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historical assets and locations. Not considering both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy standards.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of transparency results in a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research. Available summaries highlight that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of

the proposal. These reported impacts stem from direct engagement, indicating that they are based on lived experiences rather than speculation. Yet, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

There is also documented evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own research. Nonetheless, these concerns have not been adequately integrated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, which further undermines the Environmental Impact Assessment process.

A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when the character and functioning of the community may be at risk. The application does not provide the full dataset needed to accurately assess the balance between benefits and harm, failing to meet the evidential standards required.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that have not been disclosed in full. Without access to the entire assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse effects, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination, reinforcing the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

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

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

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

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

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

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

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single

integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation, obscuring the true magnitude of environmental and socio-economic consequences.

Key onshore components entail cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. 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 portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in shaping the area's cultural identity, environmental quality, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating an intrusive and continuous "wall of light" effect across the western horizon. This alteration would significantly disrupt the night-time environment, yet the application fails to assess the implications of such lighting on

visual amenity, landscape character, or the experiences of local residents and visitors.

The absence of an evaluation of impacts on nocturnal wildlife is particularly concerning. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include a lighting impact assessment or a study on phototaxis, neglecting to consider how the introduction of aviation lighting may affect these vulnerable species or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activities and associated risks faced by species such as Kittiwakes, known to forage or migrate at night. This lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of the nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and thereby precluding a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, they undermine a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the overall ecology.

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

TOURISM

The evaluation of tourism impacts associated with the proposal is severely lacking and does not adequately address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's stunning wild coastline, near-pristine landscapes, dark skies, and a distinct sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of the tourism sector.

The significance of tourism has been notable, with revenue 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 does not evaluate how the proposed industrialisation of the seascape and the consequent loss of environmental

quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains uncertain whether the development would provide a net economic benefit or potentially harm a sector that is both established and growing.

Moreover, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and supporting burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, resulting in a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In an island community that has limited economic diversification, the negligence in evaluating tourism impacts has broader ramifications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as stipulated under 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 necessity to illustrate a net benefit. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks adequate evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the combination of inadequate quantification of tourism impacts, insufficient assessment of environmental factors influencing visitor behaviour, and disregard for the island's economic dependence culminates in a significant evidential gap. This prevents a thorough evaluation of the economic effects and supports the argument 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 set out by statutory duties, national policy, and evidential standards. It brings to light the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a major concern. This new application is presented under an even stronger policy framework, which now emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for the proposal, marked by critical gaps in baseline data and the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures is concerning, as is the omission of key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts of the development.

Procedurally, the application demonstrates clear shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage and fails to demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further undermines claims of net economic benefit. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks associated with the proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

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

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

For these reasons, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I hope to return to Lewis on holiday but if you ruin it with wind turbines I am not sure I will bother.

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: 0FF27F66

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the 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 approach introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development that is ultimately constructed, leading to a failure to inform the public and the competent authority about the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the basis that potential environmental harm will be addressed later, which impedes a meaningful evaluation of effectiveness and the assessment of residual impacts. This deferment of essential information to post-consent stages is procedurally unacceptable, contradicting the purpose of the Environmental Impact Assessment regime that mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the assessment presents significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers 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 to exclude adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes essential requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives and fails to meet the statutory requirements of the Environmental Impact Assessment. Instead of providing a structured comparison of realistic alternatives based on environmental effects, it offers a narrative about the project's evolution. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging

ones.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species demonstrates significant deficiencies, failing to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is incomplete. Moreover, the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

Notably, the application neglects to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed due to a reliance on aerial

surveys, which introduces 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 properly consider such critical data results in an incomplete baseline and undermines the reliability of the conclusions presented.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies regarding the ornithological assessment, raising serious concerns about its reliability. Key evidence gaps and internal inconsistencies challenge the conclusions drawn, particularly given the presence of internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline. The proposal does not adequately demonstrate that these species will not face adverse impacts, despite their crucial presence in key foraging areas and migratory pathways. The assessment fails to thoroughly evaluate critical aspects such as displacement, collision risk, and habitat loss.

Furthermore, a fundamental contradiction within the application arises from the developer's assertion of no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency undermines the assessment's reliability and suggests that the findings are not substantiated by the evidence provided. Specifically, the assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively addressed, and the modelling techniques employed add an element of uncertainty, particularly concerning species such as Kittiwakes and Fulmars that are already in severe decline. The methodologies used appear likely to

underestimate potential mortality rates, especially given incomplete baseline data and a lack of understanding regarding behavioural responses.

The siting of turbines within a designated migratory corridor further elevates the associated risks, creating a barrier in a primary flight path that is utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term repercussions of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation activates the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

In addition, the identified deficiencies signify a lack of compliance with the National Planning Framework 4 concerning the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly contravenes national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of robust evidence. These inadequacies hinder a thorough evaluation of potential impacts and collectively support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

There are also significant concerns regarding community rights and engagement. The

Gaelic-speaking population has a unique cultural identity akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the legitimacy of the assessment and does not adhere to principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to assess the social, cultural, and economic impacts on the island community, preventing lawful determination.

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

In summary, the failure to properly assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been made public. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from understanding the full extent of social risks identified by the developer's own research. Available summaries suggest that residents are already feeling stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation. However, without access to the complete assessment, proper scrutiny of these findings is not possible, which limits the ability to evaluate their significance in the decision-making process.

There is evidence that the proposal is seen as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, these impacts have not been adequately considered in the main application. The withholding of the full Social Impact Assessment conceals the true human and social costs of the development. This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at risk. Without the complete dataset, the application does not provide a comprehensive basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and avoid harm, yet the available evidence points to existing

negative effects that remain undisclosed. Without the full assessment, it cannot be established that the application meets this policy.

The implications of these procedural issues are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes 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 full Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This ultimately prevents a lawful determination and confirms that the application lacks sufficient supporting information.

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 application presents significant shortcomings that raise urgent concerns regarding environmental protection. There is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This lack of detail hampers the evaluation of likely environmental effects, as the proposal involves extensive seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. By relying on undefined future mitigation and contingency measures, the application leaves critical questions about their adequacy and effectiveness unanswered.

Particularly alarming is the potential impact on the West Lewis coastline, which is home to clean coastal waters and vital habitats. These areas are highly sensitive to disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and possible chemical or oil spills, it fails to adequately outline how these threats will be managed or mitigated. The uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation adds to the urgency of these concerns, as it is impossible to ascertain the ecological effects without comprehensive modelling and management strategies.

Moreover, the lack of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether suitable safeguards are established to handle potential pollution events. This procedural gap introduces significant risks, making it difficult for the competent authority to assess environmental protection measures at the crucial stage of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts

the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding possible impacts render the assessment fundamentally deficient. These issues collectively hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application fails to provide a thorough evaluation of the ecological and socio-economic impacts associated with the proposal. There is a pressing concern regarding the assumption that fishing activities can be displaced without any consequences. The lack of evidence demonstrating that alternative fishing grounds are available and able to support additional pressure is particularly concerning. This oversight could lead to overfishing in other areas, impacting the livelihoods of the local fishing fleet.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life across large distances, affecting species such as dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population raises serious alarms, yet the application tends to downplay the significance of these effects, lacking sufficient 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 these impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly in instances where harm is anticipated to a level requiring legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with this integrated project. The onshore works, including the construction of a substation near Stornoway and cabling across protected moorland, are fundamentally connected to the offshore turbines; however, they are treated separately in the evaluation. This fragmented approach obscures the true environmental and socio-economic effects.

The proposed works entail excavation in areas of deep peat, particularly within Barvas Moor, which is an ecologically sensitive habitat and a vital carbon store. The application does not deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By deferring the assessment of onshore impacts, the application fails to facilitate a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The division between offshore and onshore elements results in a lack of clarity regarding the combined impacts on habitats, peatlands, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not prove that these habitats have been fully assessed or that appropriate avoidance measures have been taken, which highlights a significant gap in biodiversity protection.

Concerns also arise regarding the carbon balance, as disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern or shows that the overall carbon balance is beneficial.

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

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

In conclusion, the separation of the project's components, the absence of a

comprehensive assessment, and the lack of evidence concerning environmental and land use impacts leave this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any assessment of dark skies and nocturnal wildlife, which constitutes a significant evidential gap. The proposal, situated along the West Lewis coastline, would introduce permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, which is characterised by exceptionally dark skies that contribute to the area's environmental quality, cultural identity, and tourism value.

Moreover, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors, despite the significance of dark skies to the area's identity and the potential for emerging tourism sectors like astro-tourism. The lack of assessment in these areas reflects a clear gap in the overall landscape and environmental evaluation.

Critically, there is no examination of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can cause disorientation and increase collision risk. The application lacks any lighting impact assessment or phototaxis study, failing to address how aviation lighting could adversely affect these species or lead to increased mortality.

This omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Other species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding ecological impacts.

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

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

In summary, the absence of any evaluation of dark skies and nocturnal wildlife renders the application incomplete and incapable of supporting a lawful determination,

highlighting the critical need for baseline data, impact modelling, and species-specific analysis.

TOURISM

The application fails to adequately assess the impacts on tourism, a key sector for the Isle of Lewis economy, and does not evaluate the economic and social consequences associated with this area. Tourism in the region relies heavily on its 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 provides no quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model the potential impacts of the industrialisation of the seascape and the resultant loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis hinders the ability to ascertain whether the proposed development would yield a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significant role of environmental quality in underpinning tourism, including the critical nature of unspoiled landscapes and dark skies for visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment only exacerbates this inadequacy, creating a considerable gap in understanding the impacts on this recognised and growing part of the local economy.

In an island community that faces limited economic diversification, the oversight regarding tourism impacts raises broader concerns for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to exhibit net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to effectively assess the economic ramifications of the proposal.

In summary, 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 shortcoming prevents a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the 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

I do not want this

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: EA078470

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and supporting documents. It highlights deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. The proposal's scale, proximity, and design raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal all contribute to this inadequacy. The use of a flexible design framework obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation does not facilitate a complete or informed understanding of the environmental, cultural, or community impacts. The claims of negligible or non-significant effects are not backed by robust evidence.

There are significant conflicts with established policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to determine that the development is policy-compliant.

The scale of the proposal is unprecedented for this area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the planning application inadequately addresses the cultural heritage and identity of the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application treats heritage as a collection of static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is seen in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are places of active burial and spiritual practice, yet the assessment reduces them to static features, ignoring their continued use and significance. This mischaracterisation leads to an incomplete evaluation of cultural impacts and neglects their importance in community life.

Moreover, the application does not assess intangible cultural heritage, which includes the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity, but they are missing from the assessment, which is a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

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

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not adequately support an assessment of the true cultural cost of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents serious deficiencies in the assessment of construction and pollution risks, which are crucial for understanding potential environmental impacts. It

entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, thereby obstructing a thorough evaluation of their effectiveness and sufficiency.

This dependence on future, undefined measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate information on preventative, controlling, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on sensitive marine species and habitats identified in the broader assessment.

Furthermore, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent is granted, the application inhibits an evaluation of whether sufficient safeguards exist to manage pollution incidents. This presents procedural risks and compromises the capacity of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the principles set forth in the Environmental Impact Assessment regime. Significant effects and required mitigation must be thoroughly assessed prior to consent; the absence of such information renders a lawful determination unattainable. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment fundamentally inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery; however, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic

contribution.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to ascertain whether the development would provide a net economic benefit or detract from an established and expanding sector.

Additionally, the assessment fails to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a considerable gap in understanding the implications for a recognised and growing aspect of the local economy.

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

From a policy perspective, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector and does not provide adequate evidence to enable the competent authority to assess the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and considering the island's economic dependency result in a substantial evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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: C687A688

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 relevant marine licensing and Environmental Impact Assessment frameworks. 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. There are significant concerns regarding the development's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The documentation provided fails to establish an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information presented is both limited and inconsistent. Key elements of the proposal remain undefined, and the flexible design framework employed does not allow for a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests required for consent and hinder the competent authority's ability to determine the development's acceptability from a policy perspective.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable account of the potential environmental effects associated with the proposal. The introduction of a flexible

Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations for turbines, creates considerable uncertainty. This ambiguity obstructs a consistent assessment of worst-case scenarios, compromising the integrity of the evaluation and preventing both the public and the competent authority from fully grasping the true scale of environmental effects that may arise from the development.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be rectified at a later stage hinders any substantial appraisal of the effectiveness of these measures or the assessment of residual impacts. Deferring essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly identified before any determination is made.

There are also critical evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are asserted without robust 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 obligations.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not conform to the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been adequately assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of the evaluation of potential impacts.

A notable gap in the assessment pertains to 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. This oversight means that critical aspects such as their core foraging range and behavioural patterns have not been appropriately considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies that compromise its reliability from a regulatory standpoint. It fails to meet the evidential threshold necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside evident data gaps and limitations in the modelling approaches, indicates that the required standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

The ornithological assessment is flawed, exhibiting substantial gaps in evidence and

internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is known to support internationally significant seabird populations, many of which are in decline. Yet, the application does not adequately demonstrate that these species will remain unaffected. The development is situated within key foraging areas and migratory pathways, yet the assessment fails to robustly evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction in the application, as the developer asserts that no significant adverse effects will occur while simultaneously advancing a Habitats Regulations derogation case, a requirement that arises only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment and suggests that its conclusions are not substantiated by the underlying evidence.

Furthermore, the assessment lacks sufficient evidence regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling techniques injects uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in steep decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses remain poorly understood.

The location of the turbines within a recognised migratory corridor adds another layer of risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term consequences of sustained mortality within this corridor or the implications for species with relatively small global populations.

In summary, 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 provide evidence that internationally important seabird populations will not be adversely affected directly contradicts national policy. Taken together, these factors render the assessment unreliable due to methodological weaknesses, internal inconsistencies, and inadequate evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess the cultural heritage and community identity associated with the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected. The application reduces heritage to a collection of isolated assets and neglects their ongoing social, cultural, and spiritual functions within the community.

Cemeteries at Dalmore, Bragar, and Barvas represent significant cultural sites that remain active places for burial and spiritual practice. However, the assessment mischaracterises these sites as static features, overlooking their current use, meaning,

and the impact of development on their surroundings. This erroneous portrayal leads to an incomplete evaluation of cultural effects and disregards their vital role in community life.

Additionally, intangible cultural heritage, such as the Gaelic language and traditions, along with the enduring relationship between the community and the coastal environment, are omitted from the assessment. These elements are essential to the area's identity, and without their inclusion, the cultural impact of the development cannot be fully understood.

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

A significant 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 fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly diverges from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not adequately address the cultural impacts of the development, failing to provide a sound basis for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The community's wellbeing is at stake due to the significant deficiencies in the assessment of social impacts, health, and wellbeing associated with this proposal. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts have been confirmed through direct engagement and are not merely speculative. However, without access to the complete assessment, the ability to scrutinise these findings is

severely limited, ultimately affecting their significance in the decision-making process.

Moreover, the proposal has been perceived as a threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Despite this recognition, such impacts have not been adequately incorporated into the main application nor given the attention they deserve. By withholding the full Social Impact Assessment, the true social and human costs of the development remain obscured.

This lack of transparency further undermines the Environmental Impact Assessment process. Understanding the comprehensive social, economic, and health impacts is crucial for developments of this magnitude, especially when they threaten community character and functioning. The omission of the full dataset renders the application insufficient for assessing the balance between benefits and potential harm.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence currently suggests existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with relevant policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a critical omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, paired with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and underscores 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 inadequate and does not truly reflect the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would profoundly alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately depict the magnitude of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential properties, historic landmarks, and popular coastal areas. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence to suggest that the viewpoints chosen may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This could lead to an underestimation of the visual impacts, thus compromising the reliability of the assessment.

Another major shortcoming is the lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact, representing a more extensive cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in terms of safeguarding natural environments and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant locations. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The size, height, and proximity of the turbines would create a dominant and unavoidable presence. Consequently, the resulting transformation is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is significantly lacking in detail, failing to adequately evaluate the potential environmental effects. It involves considerable seabed preparation and installation works in a challenging high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that are to be developed after consent,

which hinders any meaningful assessment of their effectiveness or adequacy.

This reliance on vague future measures is alarming, particularly in light of the sensitive receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to detail how these risks will be prevented, managed, or monitored.

Moreover, there exists uncertainty about the extent and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the scale, duration, or ecological consequences of these impacts. This uncertainty is extended to potential effects on sensitive marine species and habitats that have already been identified in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application obstructs the ability to evaluate whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and their mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements 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 create a materially deficient assessment. These failings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a thriving fishing industry. However, the application does not adequately demonstrate how these essential uses and habitats can be preserved or sustained without causing significant disruption. There is a troubling presumption that fishing activities can simply be relocated without repercussions. The absence of evidence regarding the availability and accessibility of alternative fishing grounds raises concerns, as such displacement could lead to overfishing in other areas, adversely affecting the local fishing fleet and its livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to

the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to create disturbances over extensive distances, which may negatively impact local wildlife, including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise the significance of these potential effects without adequate supporting evidence.

There is a notable inconsistency within the application that acknowledges the necessity of licences for any harm to European Protected Species while simultaneously claiming such impacts are negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when harm is expected to occur at a level that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with both National Planning Framework 4 and the National Marine Plan. It does not show that the development can coexist with current marine users or avoid unacceptable effects on marine biodiversity, thereby hindering any conclusion that the proposal embodies sustainable development.

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

TOURISM

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

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

benefit or jeopardise an established and burgeoning sector.

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

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It presents similar issues to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and key impact pathways that have been overlooked, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete and does not provide a thorough understanding of the likely significant effects or residual impacts.

There are procedural issues as well. The absence of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a material omission.

These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

Environmental risks are uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

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

As a result, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused entirely.

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: C84FBB21

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, 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 in planning, environmental considerations, cultural aspects, 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. Concerns arise from the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of likely significant effects, and the reliance on unspecified mitigation measures means their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive or informed perspective on environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidentiary support.

There are also clear and substantive conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or reliable account of the environmental impacts associated with the proposal. The report's reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the integrity of the assessment and obscures the actual environmental impacts of the proposed development, making it difficult for the public and the competent authority to understand the true extent of these effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Seeking consent based on the assumption that environmental harm will be addressed later obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Moreover, there are serious evidential deficiencies present, such as gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not comply with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is significant and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of feasible alternatives based on environmental effects, the application presents a narrative that details the evolution of the project. This method fails to illustrate that less harmful options have been

thoroughly identified, evaluated, and chosen over more damaging solutions.

There is an absence of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where the visual, ecological, and coastal impacts are likely to be less severe. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the lack of such an analysis means that one cannot conclude that the proposed siting is the least damaging option.

These deficiencies also extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise effects on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission that contributes to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in this application is fundamentally flawed, lacking a comprehensive understanding of the ecological receptors in the West Lewis coastal area. The region is characterised by a sensitive and biologically active marine environment, yet the baseline data provided is insufficient. The methodologies employed fail to adequately document species presence, behaviour, and habitat utilisation, which in turn affects the reliability of the assessment's conclusions regarding potential impacts.

A significant oversight is noted in the treatment of otters, classified as a European Protected Species. The application does not appropriately recognise or assess their active foraging and movement within coastal zones. This lack of analysis concerning their core foraging areas and behaviour means that the implications of construction-related disturbances, including noise and increased activity, have not been thoroughly examined. Consequently, the assumptions made regarding the absence of significant

effects on otters are undermined.

Further shortcomings emerge in the assessment concerning basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, leading to a likely underestimation of their presence in these waters. This approach contrasts unfavourably with established land-based observations that indicate a frequent occurrence of basking sharks. The omission of such data contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects that are based more on assumptions than on solid evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the necessary criteria set out by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been adequately conducted. The introduced uncertainty prevents the elimination of adverse effects beyond a reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, the granting of consent would be unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an assessment that is fundamentally unreliable, lacking both robust evidence and consistency. Significant gaps in information lead to an inability to conclude that the internationally important seabird populations along the west coast of the Isle of Lewis will remain unaffected. This area is home to many seabird species that are already in decline, and yet the application fails to demonstrate, as required, that these species will not experience adverse effects.

The development is situated within critical foraging areas and migratory routes, yet the implications of potential displacement, collision risk, and habitat loss have not been thoroughly evaluated. A major inconsistency arises from the developer's assertion of no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case. Such a case is only warranted when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that its conclusions are not substantiated by the available evidence.

Moreover, the assessment does not adequately address the potential impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling raises further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed may underreport mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, as it effectively obstructs a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to comprehensively assess the long-term consequences of sustained mortality within this corridor and the potential ramifications for species with smaller global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards needed to confirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, along with data deficiencies and modelling constraints, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation necessitates the application of the precautionary principle and undermines any lawful conclusion in favour of consent.

Ultimately, the deficiencies highlighted 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 important seabird populations will remain unharmed places the proposal in direct opposition to national policy. Collectively, these issues contribute to the conclusion that the application fails to meet the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development inadequately addresses the assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A notable deficiency is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment incorrectly categorises them as static features, overlooking their continued use and meaning, as well as the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their importance to community life.

Moreover, the application fails to acknowledge intangible cultural heritage, which

encompasses the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These elements are vital to the area's identity but have been completely omitted from the assessment, creating a significant gap in understanding the cultural impact of the development.

Concerns extend to community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity that aligns with characteristics of an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural error is the absence of 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, rendering any determination unlawful.

From a policy standpoint, the inadequacies present in the proposal conflict directly with National Planning Framework 4, particularly concerning the protection of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, clearly deviates from established policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application falls short of providing a sufficient foundation for assessing the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would create a dominant industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not adequately reflect the magnitude of this change or the sensitivity of the receiving environment.

The application fails to fully represent how visual amenity would be impacted. The scale and proximity of the turbines mean that they would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This oversight erodes the defining qualities of naturalness and remoteness in the area. Furthermore, the methodology employed in selecting and presenting visual viewpoints raises significant concerns. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning

key cultural heritage sites and valued landscapes. This may lead to an understatement of the visual impact, undermining the reliability of the assessment.

Another critical deficiency is the lack of assessment regarding the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated, ignoring their interdependence, which results in an incomplete understanding of the impacts on their cultural significance and setting. The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently evaluated.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural areas and historic assets. The scale of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further jeopardises claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation. In conclusion, the assessment does not accurately depict the scale of impact, the environment's sensitivity, or the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries associated with the application is inadequate, failing to offer a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses will be protected or maintained without significant disruption.

A notable concern arises from the assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This gap is critical, as such displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due

to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is concerning; nevertheless, the application tends to underestimate the significance of these effects and lacks adequate supporting evidence.

There exists a contradiction within the application regarding the necessity of licences for harming European Protected Species, while impacts are concurrently described as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from various pressures such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering the determination of whether the proposal constitutes sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

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

susceptible to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. 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 investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the absence of any evaluation regarding dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analyses renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The assessment of tourism impacts within this application is fundamentally inadequate, neglecting to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and its unique sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Since 2017, tourism has seen remarkable growth, expanding from £65 million to over £81.5 million, while supporting over 1,000 jobs and comprising up to 16% of the island's economy. Despite this progress, the application does not evaluate how the industrialisation of the seascape and the degradation of environmental quality would affect the Tourism Gross Value Added or broader economic resilience. Without such essential analysis, it remains unclear whether the proposed development would generate a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment overlooks the critical role that environmental quality plays in fostering tourism, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences. This gap is further exacerbated by the absence of a Dark Skies Assessment, which hinders understanding of the impacts on an acknowledged and growing segment of the local economy, such as nature-based tourism and astro-tourism.

For an island community that faces limited economic diversification, the failure to thoroughly assess tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Additionally, the lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency hampers a comprehensive evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its attempt to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This application revisits the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to provide a reliable and comprehensive evidential basis for evaluation.

Key deficiencies in the application include significant gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

Additionally, the application suffers from procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory

duty under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment represents a material omission. Such deficiencies prevent the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal is incompatible with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and significant environmental risks persist, particularly concerning marine ecology, seabirds, protected species, and marine mammals. The assessments provided are incomplete and occasionally inconsistent, failing to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, which prohibits a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

I visit Lewis regularly for holidays as the untouched nature of the island is rare. These wind turbines are too close to the shore and destroy marine life and the seabed. I agree we need electricity but not at the destruction of the planet we are trying to save.

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: 9DC7CA85

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 concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The size, location, and design of the project raise critical questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application is lacking in sufficient evidential support for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and key components of the proposal are not clearly defined. The flexible design framework used inhibits a proper understanding of potential significant effects, and the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts are not backed by solid evidence.

There are evident and serious conflicts with 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 adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to conclude that the development is acceptable according to policy.

The unprecedented scale of the project raises significant issues, with large turbines proposed in close proximity to the shoreline, which could have substantial implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these conditions, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposal lacks a thorough assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured, evidence-based comparison of feasible alternatives that take into account environmental effects, the application only narrates the project's evolution. This approach does not convincingly show that less harmful options have been identified, assessed, and selected over more damaging choices.

There is a clear absence of transparent analysis regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately considered placing turbines further offshore, which could potentially lessen 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 this analysis means it cannot be concluded that the proposed siting is the least damaging.

These shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence of thorough exploration of alternative routes to mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been effectively implemented, resulting instead in an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This situation reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from discerning whether more suitable and less harmful alternatives are available. Without a robust alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the safeguarding of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight, reinforcing the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is lacking and does not give a complete or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data presented is insufficient, and the methods used do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A major gap involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal regions for foraging and movement. Without considering their core foraging areas and behaviours, the potential effects from construction disturbances, noise, and increased activity have not been properly examined. This oversight undermines any conclusions drawn about the lack of significant effects on otters.

Additionally, there are further shortcomings in the assessment of basking sharks. The reliance on aerial surveys brings significant detection bias, particularly in Atlantic

conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations that show these waters are used frequently. Neglecting to include or properly consider this data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. Furthermore, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty brought about by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

In summary, the incomplete baseline data, flawed methodologies, and unsupported conclusions render 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 does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide adequate assurance that these species will not be adversely affected, particularly given that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is lacking and does not recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are intertwined. Instead, the application simplifies heritage, viewing it as a collection of isolated, unchanging assets without acknowledging their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the way culturally important sites, like the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These sites serve as active places for burial and spiritual practice, yet the assessment reduces them to static elements, neglecting their continued significance and the potential effects of development on their surroundings. This mischaracterisation leads to a partial understanding of cultural impacts and overlooks their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are essential to the area's identity but are missing from the assessment, which is a major oversight. Failing to consider these elements means that the cultural effects of the development cannot be accurately assessed.

There are additional issues surrounding community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent.

This lack of genuine engagement undermines the assessment's validity and does not align with established principles of participation concerning cultural and environmental interests.

A significant procedural gap exists due to the absence of a proper Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these inadequacies put the proposal at odds with National Planning Framework 4, particularly regarding the protection of historical assets and locations. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly violates policy standards.

In summary, the lack of consideration for living heritage, intangible cultural value, community rights, and legal requirements creates a significant gap in the evidence. The cultural impacts of the development have not been properly evaluated, and the application lacks the necessary foundation for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations expected. Due to their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape

context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

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

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

In conclusion, the assessment fails to accurately depict the extent of the 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 preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

Particularly alarming is the reliance on undefined future measures in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation.

In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential effects on marine species and habitats recognised as sensitive within the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, both of which are vital to the local community. However, the application in question does not adequately assess the ecological or socio-economic impacts associated with its proposals. It is evident that the assessment of fisheries and marine life is insufficient, failing to provide a robust evaluation that would allow for an understanding of how these essential uses and habitats can be protected or maintained without significant disruption.

A major concern is the assumption that fishing activity can be displaced without any consequences. The application lacks evidence to support the claim that alternative fishing grounds are available, accessible, or capable of bearing the additional pressures that displacement would create. This critical omission poses a risk of overfishing in other areas, which could have far-reaching economic consequences for the local fleet. Consequently, without a clear and evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and the livelihoods of those who depend on them.

Furthermore, the proposal raises considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is anticipated to cause disturbances over large

distances, impacting species such as dolphins. The potential disturbance to a significant proportion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the significance of these effects, lacking sufficient supporting evidence to substantiate its claims.

In addition, there exists a glaring inconsistency within the application where the necessity for licences to permit harm to European Protected Species is acknowledged, even as the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the entire assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when there is an expectation of harm requiring legal authorisation.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These deficiencies hinder any comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current application lacks a thorough assessment of the onshore infrastructure, resulting in an incomplete understanding of the environmental and socio-economic impacts associated with what is essentially a single, integrated project. The offshore turbines and onshore elements, which include significant works such as cabling across protected moorland and the construction of a substation near Stornoway, are evaluated separately. This fragmented approach obscures the true scale of the impacts.

Key components of the onshore works involve excavation through areas of deep peat, notably within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. However, the application does not present a comprehensive assessment of these impacts, which hampers the ability to gauge the overall environmental footprint of the project adequately.

The assessment's failure to consider the cumulative effects of onshore impacts alongside offshore ones further complicates matters. The Environmental Impact Assessment process mandates that all aspects of a project be evaluated together, yet

this application's separation of onshore and offshore elements results in a lack of clarity regarding their combined effects on peatlands, local habitats, and the surrounding communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application does not prove that the impacts on these habitats have been thoroughly assessed, nor does it outline the avoidance measures that should be in place. This leads to a significant evidential gap concerning biodiversity protection.

The implications for carbon balance are another area of concern. The disturbance of peatland may release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The proposal fails to adequately address this issue or to demonstrate that the overall carbon balance remains positive.

Furthermore, routing infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application lacks evidence indicating that necessary consents or processes have been initiated, which brings into question the feasibility and lawful execution of the project.

From a policy standpoint, the division of project components and the failure to adequately assess and protect peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the environmental quality, cultural identity, and tourism value of the area. The proposed development introduces permanent red aviation lighting, creating a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experience of residents and visitors. The omission is particularly concerning considering the significance of dark skies for the region's identity and the potential for growth in sectors such as astro-tourism.

Furthermore, there is no evaluation regarding the impact on nocturnal wildlife. Sensitive species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, face disorientation and increased risk of collision due to artificial lighting.

The absence of any lighting impact assessment or phototaxis study means that the application neglects to consider how aviation lighting may affect these species or lead to increased mortality rates. Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities and associated risks of species like Kittiwakes, which may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting. The lack of site-specific night-time data results in a significant gap in understanding the ecological impacts.

Without a thorough assessment of these nocturnal effects, it remains impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thereby engaging the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the night-time character is a vital part of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis leads to an incomplete application that cannot adequately support a lawful determination.

TOURISM

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

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

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

In an island community that faces limited economic diversification, the omission of tourism impact assessments has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been duly considered, as required under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards of sustainable development when evaluated against statutory requirements and national policy. This application brings forth the same fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically concerning unacceptable levels of industrialisation. The current proposal is submitted within a stronger policy context that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the application is incomplete and unreliable. There are significant gaps in baseline data, it employs an undefined design envelope, and relies on unspecified mitigation measures. Additionally, critical impact pathways have been overlooked, including nocturnal wildlife, the complete onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are notable failures. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment is a material oversight. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4 as it does not adequately protect biodiversity, natural areas, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic

benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. The assessments of marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in places. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle, which prevents a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B33D9BEA

