

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

Dear Sir/Madam

This letter formally objects to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from an analysis of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies in planning, environmental matters, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. There are serious concerns about how the scale, design, and location of this project align with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Key environmental data is absent, baseline information is inconsistent and limited, and various elements of the proposal remain unclear. The reliance on a flexible design framework complicates the assessment of likely significant effects. Furthermore, the proposed mitigation measures have not been clearly defined, making 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 strong evidence.

There are evident policy inconsistencies with national frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity and environmental integrity. These inconsistencies challenge the statutory tests required for consent, compromising the competent authority's ability to deem the development acceptable from a policy perspective.

The size of the proposal is unprecedented for this area, with large turbines situated near the shoreline, which raises substantial concerns about landscape capacity, visual impact, and environmental consequences. In light of the insufficient information provided, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy conflicts, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must be applied in this case.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The deficiencies in the assessment of cultural heritage and community identity are profound and troubling. It is essential to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application reduces heritage to a collection of isolated and static assets, neglecting their vital social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These places are active sites of burial and spiritual practice, yet they are mischaracterised as mere static features. The assessment fails to account for their ongoing use and significance, nor does it consider the potential impacts of development on their surroundings. This oversight leads to an incomplete evaluation of cultural effects and disregards the essential role these sites play in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are integral to the area's identity and their absence from the assessment represents a considerable oversight. Without their inclusion, it is impossible to grasp the full cultural impact of the development.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity that is recognised as characteristic of Indigenous Peoples. However, the absence of a process for Free, Prior and Informed Consent undermines the legitimacy of the assessment and fails to uphold established principles for participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This significant omission prevents a lawful determination of the proposal.

From a policy standpoint, these failures put the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. Ignoring both tangible and intangible heritage, and failing to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application lacks the necessary foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical flaw that undermines the application's validity. The developer's commissioning of a Social Impact Assessment, which included focus groups with local residents, has not resulted in the publication of the full report. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the social risks identified through the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct community engagement, are not speculative in nature. However, without access to the complete assessment, the findings lack proper scrutiny, which limits the assessment of their significance in the decision-making process.

Moreover, the proposal has been perceived as a direct threat to community identity and cohesion, with indications of "cultural loss" noted in the developer's findings. Yet, these critical impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This transparency issue also affects the Environmental Impact Assessment process. To fully understand the social, economic, and health impacts of a development of this scale, especially regarding community character and functioning, all data must be available. The absence of the complete dataset means that the application does not provide a thorough evidential basis for assessing the balance between potential benefits and harm.

From a policy standpoint, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes while avoiding harm; however, the available evidence suggests existing adverse effects that have not been disclosed. Without the full assessment, it cannot be confirmed that the application aligns with this policy.

The procedural implications of these shortcomings are considerable. 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 in the application that fails to satisfy 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 situation hinders a lawful determination and further underscores that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an expansive Atlantic horizon, a lack of development, and a strong feeling of remoteness. The addition of large-scale turbines near the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this unique character and leading to a permanent alteration of the landscape.

Moreover, the application does not sufficiently depict the scale of the visual changes anticipated. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence suggests that the viewpoints selected may overlook the most sensitive receptors or fail to address worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This could result in an underestimation of visual impact, calling into question the credibility of the assessment.

Another significant oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting that visually and spatially relates to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating them as isolated assets, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The degree of change proposed is inconsistent with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

In summary, the assessment fails to accurately depict the magnitude of impact, the

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, an essential part of its environmental quality, cultural identity, and tourism potential. The proposal plans to introduce permanent red aviation lighting that will be visible over long distances. This lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This is especially concerning given the importance of dark skies to the area's identity and emerging tourism sectors, such as astro-tourism. The lack of consideration of these impacts creates a gap in the overall assessment of the landscape and environment.

More importantly, there is no analysis of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting because it can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, failing to evaluate how aviation lighting might impact these species or contribute to higher mortality rates.

This lack of assessment is further exacerbated by the dependence on daytime survey data in the ornithological evaluation, which fails to account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this risk has not been evaluated. The absence of site-specific night-time data represents a critical gap in understanding the ecological consequences.

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

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

Overall, the failure to assess dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and specific analysis of

species renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally inadequate in meeting the criteria for sustainable development as set forth by statutory obligations, national policy, and evidential standards. It echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current proposal, despite being under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to address these critical issues.

Furthermore, the application lacks a comprehensive and reliable evidential foundation for assessment. It presents significant deficiencies in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and neglects to consider important impact pathways related to nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of the potential significant effects and residual impacts.

Procedural errors are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as mandated by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment presents a material shortfall, obstructing the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for consideration.

The proposal contravenes the National Planning Framework 4 by not sufficiently demonstrating the protection of biodiversity, natural sites, and cultural heritage. It does not adequately assess health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

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, at times, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Moreover, 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, disruptions to cultural and visual connections, and effects on tourism are permanent changes that cannot be mitigated to a satisfactory degree.

In summary, this application is procedurally and substantively unfit for determination. The multitude of information gaps, coupled with conflicts in policy and unresolved environmental uncertainties, impede a lawful and evidence-based decision. The competent authority must reject this application outright or utilise the applicable regulatory measures to require the submission of the necessary information.

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

Additional Comments

Coming from the village of Barvas and spending a lot of time there I have great concerns about the effect these turbines are going to have on the community the noise the darkness the people's wellbeing. Also the beautiful landscape that we have been so blessed to have ruined with these massive structures..

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: 7834F380

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site 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 proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to provide a clear and trustworthy account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of specificity undermines the assessment's reliability and means the impacts described may not accurately represent the final development, limiting the ability of the public and the competent authority to grasp the true environmental effects.

The application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that environmental harm will be addressed later, which hinders any genuine evaluation of effectiveness or assessment of remaining impacts. This deferral of critical 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 strategies should be clearly outlined before determination.

Furthermore, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate. This marine system is both sensitive and biologically active, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat usage of species. Consequently, there is no solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, which are classified as a European Protected Species. The application fails to adequately recognise and assess their active use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the assessment neglects to evaluate the potential impacts of construction disturbance, noise, and increased activity. This gap undermines any claims of negligible effects on this species.

Moreover, the assessment of basking sharks suffers from substantial deficiencies. The reliance on aerial surveys leads to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents their presence, especially when compared to established land-based observations that show frequent use of these waters. By not properly incorporating such data, the assessment presents an incomplete baseline and weakens the validity of its conclusions.

These methodological shortcomings result in claims of negligible or non-significant effects being based on mere assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, introducing uncertainty about the real risks facing marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4. The necessary identification and assessment of protected species are lacking, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, and consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the ornithological environment, particularly given that it is situated within key foraging areas and migratory pathways for seabirds. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide adequate evidence that these species will not be adversely affected. The assessment lacks a thorough evaluation of the implications of displacement, collision risk, and habitat loss, which are critical factors in understanding the potential impacts on these birds.

There are fundamental contradictions present in the application itself, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats

Regulations derogation case, which is typically warranted only where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the necessary evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully acknowledged, and the modelling approaches employed create uncertainties, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional and significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately examine the long-term ramifications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with gaps in data and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and precludes a lawful conclusion that could support consent.

Overall, 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 opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a comprehensive 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 regarding the cultural heritage and community identity of the West Lewis coastline is fundamentally deficient. It fails to recognise this area as a living cultural landscape where the environment, language, tradition, and community are intricately connected. The application adopts a simplistic view, treating heritage merely as isolated and static assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment incorrectly categorises them as static features. This oversight neglects their continued use and meaning, as well as the implications of

development on their surroundings. Consequently, this misrepresentation leads to an inadequate evaluation of cultural impacts and ignores their essential role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines would be situated in close proximity to the shoreline, introducing a continuous industrial presence that would fundamentally alter this character. This change would result in a permanent and irreversible transformation of the landscape.

The application fails to properly assess the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the natural and remote qualities of the area. The assessment does not adequately convey the significance of these impacts on such a sensitive landscape.

There are also concerns regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This may lead to an understatement of the visual impact, calling into question the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important 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. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

The proposed industrialisation of the seascape would sever these vital connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This would not only create a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change proposed is incompatible with safeguarding the landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any claims of policy compliance.

Additionally, the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation efforts.

In summary, 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 reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, 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.

FISHERIES AND MARINE LIFE

The concerns regarding the assessment of fisheries and marine life highlight significant shortcomings in evaluating ecological and socio-economic impacts. The West Lewis coast is home to a rich marine ecosystem and supports an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these vital habitats and activities, raising serious concerns about potential disruptions.

A major flaw in the application is the erroneous assumption that fishing activities can be easily displaced without negative effects. There is no supporting evidence indicating that alternative fishing grounds are available or capable of sustaining increased pressure. This lack of consideration is crucial, as it risks overfishing in other areas and may lead to broader economic repercussions for the local fishing community. The absence of a clear and substantiated assessment inhibits a proper understanding of the impacts on fisheries and local livelihoods.

Moreover, the potential risks to marine species, especially due to construction-related underwater noise, are of great concern. The expected high-energy hammer piling over a prolonged period poses disturbances that could affect marine life, including the local bottlenose dolphin population. Despite the predicted significant disruption, the application downplays these potential effects and fails to provide adequate supporting evidence for its claims.

There exists a troubling inconsistency in the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises significant questions regarding adherence to the Habitats Regulations, especially in instances where anticipated harm necessitates legal approval.

Additionally, the application does not address cumulative impacts stemming from various pressures like 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 the socio-economic fabric of the area.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, casting doubt on the notion that this proposal aligns with sustainable development principles.

In summary, the gaps in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application collectively render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's assessment of onshore infrastructure is fundamentally lacking and does not take into account the full range of impacts associated with this single integrated project. There is a clear interconnection between the offshore turbines and the onshore works, yet they have been evaluated in isolation, leading to a fragmented assessment that conceals the true extent of environmental and socio-economic consequences.

Key onshore components of the project involve the installation of cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Notably, these activities require excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive environment. The application does not offer a thorough analysis of these impacts, which hinders a complete understanding of the project's environmental footprint.

By neglecting to evaluate onshore impacts or postponing their assessment, the application obstructs a proper review of cumulative effects. The Environmental Impact Assessment process mandates that all project elements be considered collectively; however, the disjointed analysis of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

There are substantial risks posed to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application fails to illustrate that impacts on these critical habitats have been comprehensively assessed or that effective avoidance measures are in place, resulting in a significant gap in evidence regarding biodiversity protection.

Furthermore, the proposal raises troubling questions concerning carbon balance. Disturbing peatland releases stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence to confirm that necessary consents or processes have been initiated, casting doubt on the project's deliverability and legal compliance.

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

In summary, the disconnection between project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts result in this part of the application being incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a serious oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration

is particularly troubling given the significance of dark skies to the area's identity and to emerging tourism sectors, including astro-tourism. Such omissions result in a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or phototaxis studies, failing to address how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. For example, Kittiwakes may forage or migrate at night and are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological setting.

In summary, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unsuitable for lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis provided for this application, including incomplete baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways such as effects on

nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, the application exhibits clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is at odds with National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been properly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold required to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing any lawful conclusion that impacts can be deemed acceptable.

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

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

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

Additional Comments

I am sicked by the size and scale of this development, the impacts will be devastating in this pristine sea, and will seen and heard for miles all over the Outer Hebrides. The infrastructure required on land is unprecedented especially on top of peat which is a natural carbon sink and building on top will cause irreversible damage.

The impacts of the influx of workers who do not know island culture and are known for

causing fights and using prostitute in a cultural sensitivity community will cause so much harm. The island doesn't have the infrastructure - shops, hospital, doctors, schools, ferries to handle the land number of workers proposed. They will come briefly and leave a mess.

There are issues with ferry capacity and managing to get workers and materials to the island; the island already struggles with the ferry space as it is.

This development must be stopped.

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: F8B20265

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under marine licensing and Environmental Impact Assessment regimes. The application is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Significant concerns arise from the scale, proximity, and design of the proposal regarding its compatibility with statutory requirements, national policy, and principles of sustainable development.

An adequate evidential basis for lawful determination is lacking in the application. Critical environmental data is absent, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework prevents a clear understanding of likely significant effects. Furthermore, the dependence on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are also evident policy conflicts. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These conflicts are pertinent to the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development as acceptable in policy terms.

The scale of the proposal is unprecedented for this area, with large turbines positioned close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This significant alteration of the night-time environment threatens the exceptionally dark skies of the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to

assess the impacts of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the crucial role dark skies play in the region's identity and in emerging sectors such as astro-tourism.

Moreover, there is a complete lack of evaluation regarding the impact on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting may affect these species or contribute to increased mortality rates. This gap is further compounded by the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activity or the associated risks. Vulnerable species, such as Kittiwakes, which forage or migrate at night, remain unassessed in terms of their risk of disorientation from artificial lighting.

Without a comprehensive assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The failure to meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt invokes the precautionary principle, thereby precluding a lawful determination. Additionally, from a policy standpoint, this omission contradicts National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the thorough assessment of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In conclusion, the lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the criteria for sustainable development when evaluated against statutory duties and national policy. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application, however, is framed within a stronger policy context that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

A reliable evidential foundation for this determination is lacking, marked by notable gaps in baseline data and the use of an undefined design envelope. It heavily relies on unspecified mitigation measures while overlooking crucial impact pathways, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a full understanding of the significant likely effects or residual impacts.

Procedural shortcomings are evident as well, notably the absence of a compliant Island

Communities Impact Assessment, which violates statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment constitutes a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal fails to ensure the protection of biodiversity, natural spaces, and cultural heritage. It does not sufficiently demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their repercussions on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals remain incomplete and, at times, inconsistent. The requisite evidential threshold needed to discount adverse effects beyond reasonable scientific doubt has not been achieved, thereby activating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the implications for tourism represent enduring effects that cannot be mitigated to an acceptable degree.

When considered collectively, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or invoke the necessary regulatory provisions to demand the submission of the missing information.

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

Additional Comments

To the Energy Consents Unit / Comhairle nan Eilean Siar,
I am writing to formally object to the Spiorad na Mara Offshore Wind Farm. Although I am based in Stirling, I am a frequent visitor to the Isle of Lewis for both personal recreation as a hiker and professional purposes as a filmmaker specialising in weddings and landscape cinematography.

My objection is based on the following professional and environmental concerns:

1. Impact on the Creative Economy and Tourism

As a filmmaker, I am hired by couples specifically to capture the "wild" and

"untouched" aesthetic that the West Side of Lewis offers.

- The "Visual Capital": The vast, open horizons are the primary draw for the high-end wedding tourism market. Placing a massive industrial array on the horizon fundamentally alters the "vibe" of the location, rendering it less desirable for couples seeking a remote, natural Scottish experience.
- Economic Harm: If the landscape is industrialised, the Isle of Lewis loses its competitive edge against other destinations. This directly impacts my ability to market the area to clients and, by extension, affects the local hospitality businesses I work alongside.

2. Destruction of Dark Skies and "Natural Wonder"

One of the most significant draws for my work and my personal hiking trips is the pristine dark skies.

- Light Pollution: The requirement for aviation safety lighting on these turbines will introduce permanent light pollution to a horizon that is currently pitch black. This destroys the opportunity for night-sky cinematography and astrophotography, which are core components of the "wonders" I aim to capture.
- Loss of Wilderness: For hikers and visitors, the Isle of Lewis represents a rare escape from industrial infrastructure. The scale of Spiorad na Mara replaces a natural wonder with a permanent industrial vista, significantly degrading the recreational value of the coast.

3. Biodiversity and Ecological Integrity

During my time filming and hiking on the island, I have witnessed the incredible density of birdlife and marine mammals that inhabit this coastline. I am deeply concerned that the construction noise and the physical presence of the turbines will:

- Displace sensitive wildlife that forms the backbone of the island's natural appeal.
- Disrupt the ecosystem of the West Side, which is far more fragile than the developer's assessments suggest.

Conclusion

The "value" of the Isle of Lewis is not merely in its energy-producing potential, but in its status as a world-class landscape. As someone who contributes to the local economy through the creative arts and tourism, I believe this project represents a net loss for the island's heritage and future appeal. I urge the committee to protect these unique horizons and refuse consent.

Sincerely,

[Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0D83460A

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 marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and clarity to provide a reliable account of the likely environmental effects stemming from the proposal. The approach of using a flexible Project Design Envelope, without committing

to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This undermines the integrity of the assessment and prevents a consistent worst-case scenario from being applied. As a result, the impacts described may not accurately represent what will ultimately be constructed, which impedes both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

The application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This implies that consent is being sought with the expectation that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation measures are clearly established prior to decision-making.

Moreover, there are notable evidential deficiencies, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This introduces uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not comply with statutory obligations.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct 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 an adequate assessment of alternatives, which is essential to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison of realistic alternatives based on their environmental effects, the documentation presents a narrative of the project's evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a lack of transparency and an absence of an evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has sufficiently considered the possibility of placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the lack of such analysis undermines any argument that the proposed siting is the least damaging option.

The deficiencies are further evident in the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented, with an over-reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy obstructs the competent authority from determining whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these shortcomings compromise adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission, leading to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally flawed, lacking a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the methodologies used do not adequately capture critical aspects such as species presence, behaviour, and habitat use. Consequently, the conclusions drawn fail to provide a robust evidential basis for evaluating potential impacts.

Significant omissions are evident in the treatment of otters, which are a European Protected Species. The application does not adequately assess their foraging and movement in coastal areas, neglecting to consider their core foraging range and behavioural patterns. This oversight means that the potential impacts of construction-related disturbance, noise, and increased activity remain inadequately evaluated, undermining any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals substantial deficiencies, as it relies on aerial surveys that introduce considerable detection bias, particularly in Atlantic conditions. This reliance likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate relevant data further contributes to an incomplete baseline, ultimately diminishing the reliability of the presented conclusions.

These methodological shortcomings result in claims of negligible or non-significant effects that are based on mere assumptions rather than sound evidence. The lack of sufficient baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby generating uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally justifiable.

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

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 development lacks a thorough assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets. This view fails to acknowledge the area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined.

In particular, the treatment of significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a major shortcoming. These sites are not merely historical features; they serve as active places of burial and spiritual practice. However, the assessment categorises them without considering their ongoing use and the implications of development on their surroundings. This misrepresentation results in an incomplete evaluation of the cultural effects, neglecting their importance in community life.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, creating a significant gap in

understanding the cultural impact of the development.

Moreover, there are notable concerns surrounding community rights and engagement. The Gaelic-speaking population, which embodies the distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The absence of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, preventing a lawful determination of the proposal.

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

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a sufficient foundation for determining the true cultural cost of the proposed development.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's evaluation of social risks identified in the developer's own research. Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, resulting from direct engagement, are not speculative, yet the lack of transparency regarding the full assessment restricts proper scrutiny of these findings and limits their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" identified in the developer's findings. Despite this, the impacts have not been adequately integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The absence of transparency severely undermines the Environmental Impact

Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning could be affected. By failing to provide the full dataset, the application does not present a complete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must facilitate positive health outcomes and avoid causing harm; however, the evidence suggests existing adverse effects have not been fully disclosed. In light of the incomplete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. Without access to the complete Social Impact Assessment, the competent authority cannot conduct a robust socio-economic and health evaluation. This represents a material omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This lack of information prevents a lawful determination and confirms that the application is not supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts contains significant deficiencies and fails to appropriately convey the extent of change and the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic horizon and a pronounced sense of remoteness. The proposal to introduce large-scale turbines near the shoreline would establish a persistent industrial presence, thereby fundamentally transforming this character and effecting a permanent and irreversible alteration to the landscape.

Concerns arise from the inadequacy of the application in representing the scale of visual change. The proximity and size of the proposed turbines would dominate views from residential areas, historical sites, and frequently visited coastal spots, negatively impacting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the magnitude of this impact or its significance within such a sensitive landscape.

Methodological issues related to the selection and presentation of visual viewpoints must also be addressed. Evidence indicates that the viewpoints chosen may not fully capture the most sensitive receptors or portray worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This omission raises concerns that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Moreover, the assessment fails to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as standalone assets, neglecting their interdependence, which results 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 perceived and severing their connection to the natural horizon. This change represents not just a visual concern but a more profound cultural and spatial detriment that has not been sufficiently examined within the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The scale of change introduced is inconsistent with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further detracts from any assertion of policy compliance.

Additionally, the identified impacts are such that they cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the nature of the transformation is profound and permanent, rather than something that could be mitigated to an acceptable level.

Overall, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate. It lacks the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been provided. Instead, the application depends on mitigation and contingency measures to be developed after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is alarming due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not sufficiently outline how these issues will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes resulting

from seabed disruption and cable installation. Without effective modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to possible effects on marine species and habitats already recognised as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards exist to address pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, delaying essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and when such information is lacking, a lawful determination cannot occur. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment fundamentally flawed. These deficiencies hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

There is also a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, as it acknowledges the requirement for such authorisation while simultaneously describing the impacts as negligible. This

contradiction undermines the assessment's credibility and raises issues about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This lighting will fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. The Environmental Impact Assessment fails to address the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Such an omission is particularly concerning given the significance of dark skies to the area's identity and the burgeoning tourism sector focused on astro-tourism.

Moreover, there is no evaluation of the impact on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, potentially facing disorientation and an increased risk of collision. The application does not include any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might influence these species or lead to increased mortality rates.

The shortcomings are exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this hazard has not been examined. The absence of site-specific night-time data leads to a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would be negatively affected. The

evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the lack of assessment contradicts the National Planning Framework 4, which seeks to protect natural places and uphold environmental quality. Additionally, it weakens the overall evaluation of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

In conclusion, the failure to assess 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application brings forth the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was evident. Although the current application is presented under a more robust policy framework, it places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable and comprehensive evidential basis for determination is notably lacking in the application. Critical gaps exist in the baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways are omitted, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or residual impacts.

Procedural inadequacies are also present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations set out in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission. These gaps obstruct the competent authority from assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to National Planning Framework 4, as it fails to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been properly assessed, obscuring the 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 not only incomplete but also exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and 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, disruptions to cultural and visual relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable degree.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: OBA093A4

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and rich cultural identity. Concerns arise from the scale, proximity, and design of the wind farm, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain undefined, which hinders a clear understanding of its likely significant effects. The use of a flexible design framework complicates the assessment further, while the unspecified reliance on mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant 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 light of these issues, it is essential to invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. The flexible Project Design Envelope employed, lacking

concrete turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment and obscures the true environmental impacts, preventing both the public and the competent authority from fully understanding the proposal's consequences.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established prior to any determination.

The report also suffers from considerable evidential shortcomings, including gaps in baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a scientific uncertainty that is incompatible with statutory requirements.

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

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies inhibit a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot adequately evaluate the application based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species for the West Lewis coastal environment is fundamentally inadequate, failing to provide a complete understanding of ecological receptors in this sensitive and biologically rich marine system. The methodologies employed are insufficient, leading to incomplete baseline data that do not reliably capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

The assessment notably overlooks otters, classified as a European Protected Species. The application does not adequately recognise or evaluate their active use of coastal

areas for foraging and movement, failing to consider their core foraging range and behavioural patterns. This gap in understanding means that the potential effects of construction disturbance, noise, and increased activity on otters have not been properly assessed, undermining any conclusions regarding the absence of significant effects on this species.

Similar deficiencies are evident in the assessment of basking sharks, where reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thus compromising the reliability of the conclusions drawn.

These methodological shortcomings render conclusions of negligible or non-significant effects based more on assumptions than on robust evidence. Furthermore, the absence of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the broader ecosystem. This creates uncertainty about 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 has not properly identified or assessed protected species. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and indicate that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable, presenting significant internal inconsistencies and substantial gaps in evidence that undermine its findings. Key foraging areas and migratory pathways, essential for the internationally important seabird populations along the west coast of the Isle of Lewis, are not adequately protected. The application fails to demonstrate, with the required evidential standard, that these species will remain unaffected. Moreover, the siting of turbines within a recognised migratory corridor creates considerable risks, as it potentially acts as a barrier for species migrating between the United Kingdom and Iceland.

A glaring contradiction exists, wherein the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and raises concerns that its

conclusions are unsupported by the evidence. The methodologies used in the assessment appear to underestimate potential mortality, particularly given that baseline data is lacking and behavioural responses of the species are not well understood.

Furthermore, the assessment does not sufficiently consider the seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, or fully account for the importance of their feeding grounds. The reliance on modelling approaches adds a layer of uncertainty, especially for species already experiencing severe declines, such as Kittiwakes and Fulmars.

From a regulatory viewpoint, the application does not meet the evidential threshold required to establish no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful conclusion in support of consent.

In addition, the identified deficiencies constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is deeply flawed, particularly in its treatment of the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intertwined. This application diminishes heritage to a collection of disconnected, static assets, neglecting their active social, cultural, and spiritual roles within the community.

A significant oversight is evident in the evaluation of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as living places of burial and spiritual engagement, yet they are misrepresented as static features. This failure to acknowledge their ongoing use and significance not only leads to an incomplete understanding of cultural impacts but also overlooks their integral role in community life.

Additionally, the assessment neglects intangible cultural heritage, including the Gaelic language and traditions, alongside the long-established connection between the community and their coastal environment. These aspects are essential to the identity of the region, yet they are entirely omitted from the analysis, leaving a considerable gap in understanding the cultural ramifications of the development.

There are further issues regarding community rights and the lack of engagement with

the Gaelic-speaking population, who possess a distinct cultural identity akin to Indigenous Peoples. The absence of a Free, Prior and Informed Consent process calls into question the validity of the assessment and contravenes recognised participatory principles in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural shortcoming due to the failure to conduct a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy expectations.

Ultimately, the combined neglect of living heritage, intangible cultural significance, community rights, and statutory obligations creates a substantial evidential void. The cultural effects of the proposed development have not been adequately evaluated, leaving the application insufficient for a thorough assessment of the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is significantly inadequate and lacks the transparency necessary for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made available. This creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the full range of social risks identified in the developer's own research.

There is evidence suggesting that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are thus not conjectural. However, the non-disclosure of the full assessment inhibits proper scrutiny of the findings, limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" acknowledged in the developer's findings. Despite this, such impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency detracts from the Environmental Impact Assessment process.

A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality may be compromised. By not providing the complete dataset, the application does not offer a thorough evidential foundation for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the available evidence suggests existing adverse effects that remain partially undisclosed. Without the full assessment, compliance with this policy cannot be verified.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission within 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, coupled with evidence of existing adverse impacts, results in an assessment that is both incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Another notable deficiency is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape context, defined by visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to recognise their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural value.

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

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

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes envisaged would be fundamental and permanent, rendering the possibility of acceptable mitigation illusory.

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

CONSTRUCTION AND POLLUTION RISKS

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

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline is known for its clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. While the application

acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Additionally, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By deferring contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place to respond to pollution events, introducing procedural risk that hinders the competent authority's capacity to assess 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 must be assessed prior to consent, and without this information, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application does not adequately evaluate the impacts on fisheries and marine life, presenting significant risks to both the ecosystem and the local fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector, yet the proposal fails to establish how these vital resources can be preserved amidst development activities without causing major disruptions.

One critical concern is the assumption that fishing activities can be relocated without any negative effects. The application lacks supporting evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressures of displaced fishing efforts. This gap in information is crucial, as it raises the possibility of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and community livelihoods remain poorly understood due to this lack of a clear and evidence-based assessment.

Furthermore, the proposed development poses notable risks to marine species,

especially due to the underwater noise generated during construction activities. High-energy hammer piling is anticipated to cause disturbances across extensive distances, which could adversely affect local species, including dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without adequate evidence to support such claims.

There is also a troubling inconsistency within the application regarding the necessity of licenses for actions that may harm European Protected Species. While the potential for such harm is acknowledged, impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises serious concerns about adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts that arise from multiple sources of pressure, such as habitat disruption, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a comprehensive evaluation of impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a substantial omission within the Environmental Impact Assessment. The proposal is set against the backdrop of the West Lewis coastline, known for its exceptionally dark skies, which are vital to environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, visible over long distances, threatens to create an intrusive "wall of light" effect along the western horizon, fundamentally changing the night-time environment.

Additionally, there has been no analysis of the impact this lighting would have on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the growth of sectors such as astro-tourism, this failure represents a substantial gap in the overall landscape and environmental assessment.

Of even greater concern is the complete lack of evaluation regarding nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can disorient them and elevate the risk of collisions. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, as well as their mortality rates, have not been considered.

This lack of evaluation is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate during the night, are likewise at risk of disorientation from artificial lighting, yet this has not been addressed. Without specific night-time data, a critical understanding of ecological impacts remains unformed.

In the absence of an assessment of these 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, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which prioritises the protection of natural places and environmental quality. Moreover, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

Cumulatively, the failure to assess dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant failure in meeting the requirements of sustainable development as measured against statutory duties, national policy, and evidential standards. It echoes the critical concerns 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 presented under a more robust policy framework, one that places an increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough examination reveals that the application lacks a complete and dependable evidential basis for determination. There are essential gaps in the baseline data, the design envelope remains undefined, and there is an overreliance on unspecified mitigation measures. Furthermore, it fails to address crucial impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of potential significant effects or

residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is 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 inadequate for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage. The proposal fails to validate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as there has been no tourism impact modelling. The cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring the potential effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks, with the assessments of marine ecology, seabirds, protected species, and marine mammals being incomplete and occasionally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or invoke the appropriate regulatory provisions to require the submission of the missing 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: C6CC1246

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and dependable account of the anticipated environmental effects associated with the proposal. The report's employment of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach obstructs a consistent application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and the competent authority from fully grasping the true extent of the environmental implications.

The application predominantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is being pursued on the premise that any environmental harm will be addressed subsequently, which hinders a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally untenable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are clearly articulated prior to determination.

There exist substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty concerning the magnitude and significance of impacts, particularly where assertions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not fulfil the evidential standards mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invocation of the precautionary principle is particularly pertinent regarding protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, especially concerning biodiversity protection and environmental integrity, as it fails to show that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and the deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These flaws obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority ill-equipped to make an informed determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that does not adhere to the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of offering a coherent and evidence-based comparison of realistic alternatives concerning

environmental effects, it provides a narrative of how the project has evolved. This narrative does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and an absence of evidence in the comparison of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

The shortcomings also extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with a lack of comparative analysis, suggests that mitigation by design has not been appropriately applied, leading instead to reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a departure from the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more suitable and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly deficient, failing to provide a complete and reliable understanding of the ecological receptors present. This area represents a highly sensitive and biologically active marine system, yet the baseline data collected is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One major oversight pertains to otters, classified as a European Protected Species, which the application does not adequately recognise or assess regarding their active

use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns raises concerns, as the potential effects of construction-related disturbances, noise, and heightened activity have not been thoroughly evaluated. This significant omission undermines the conclusions drawn about the absence of serious effects on this species.

Additional shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The neglect to incorporate or adequately consider such pertinent data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. The lack of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This situation creates uncertainty about the actual level of risk posed to marine species and habitats.

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These critical deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed, exhibiting serious internal inconsistencies and significant gaps in evidence that undermine its findings. The application does not meet the necessary evidential standard to demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, which are already experiencing declines, will not be adversely impacted. Key foraging areas and migratory pathways are within the development's location; however, the assessment inadequately addresses the risks associated with displacement, collision, and habitat loss.

A critical contradiction arises in the application, where the developer asserts there are no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is typically invoked when significant harm is anticipated. This

inconsistency raises serious doubts about the credibility of the assessment, indicating that the conclusions drawn are not backed by the requisite evidence. Furthermore, there is insufficient evidence presented to confirm that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds has not been adequately considered, and the reliance on modelling techniques introduces further uncertainty, particularly for species like Kittiwakes and Fulmars that are already in critical decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The placement of turbines within an established migratory corridor poses an additional severe risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The assessment fails to sufficiently evaluate the long-term implications of ongoing mortality in this corridor, as well as the potential repercussions for species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to conclude that there would be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion that would support the granting of consent.

Moreover, the identified deficiencies represent a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to assure that internationally important seabird populations will remain unaffected positions the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow view, treating heritage as isolated, static elements and neglecting their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the handling of culturally important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice, yet the assessment reduces them to static features without acknowledging their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to a partial evaluation

of cultural effects and dismisses their integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the identity of the area but are entirely missing from the evaluation, creating a significant gap. Ignoring these factors undermines the ability to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been undertaken. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to examine the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear deviation from policy expectations.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been sufficiently evaluated, leaving the application without a solid foundation to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency concerning social impacts, health, and wellbeing is critically lacking, which undermines the evaluation process. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the absence of the full report constitutes a significant evidential gap. This lack of disclosure inhibits both public understanding and the competent authority's assessment of the social risks highlighted in the developer's own research.

According to available summaries, residents are already reporting measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and therefore should not be considered speculative. However, without the full assessment, there is inadequate scrutiny of these findings, limiting the ability to gauge their significance in the decision-making

process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with evidence of “cultural loss” noted in the developer’s findings. Despite this, such impacts have not been properly integrated into the primary application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency further compromises the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. The failure to provide the complete dataset means the application does not furnish a thorough evidential foundation for weighing benefits against harm.

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

The procedural ramifications are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the non-disclosure of the full Social Impact Assessment. This represents a material omission within the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the overall assessment incomplete and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application is insufficiently informed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would lead to a continuous and dominant industrial presence, fundamentally transforming this character in a permanent and irreversible manner. The assessment fails to adequately represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The failure to convey the true extent of this impact within the context of such a sensitive landscape raises significant concerns.

Moreover, methodological issues are evident in the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately represent the

most sensitive receptors or worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a risk that the actual magnitude of visual impact has been understated, which undermines the reliability of the assessment process.

Additionally, there is a critical deficiency in the assessment's treatment of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these assets in isolation, disregarding their interdependence and leading to an incomplete assessment of impacts on their setting and cultural significance.

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

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

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

In summary, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the 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 support an active fishing industry. The assessment of fisheries and marine life provided by the application is insufficient and does not adequately evaluate the ecological or socio-economic impacts. A crucial issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds are available and accessible, which raises concerns about the risk of overfishing and the potential economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hinders a proper understanding of the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling

planned for an extended period is expected to cause disturbances over large distances, potentially affecting marine species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay these effects without sufficient evidence to support such minimisation.

Moreover, the application acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where anticipated harm is significant enough to require legal authorisation.

Cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity, are not adequately addressed in the assessment. 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 compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users and avoid unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions make the assessment incomplete and unreliable. These shortcomings prevent a robust evaluation of impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline boasts exceptionally dark skies, contributing to the area's environmental quality, cultural identity, and tourism potential. The proposal intends to introduce permanent red aviation lighting that would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

The application lacks an evaluation of the lighting's impact on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the area's identity and the emerging tourism sector focused on astro-tourism. The neglect to assess these factors creates a discernible gap in the overall landscape and environmental evaluation.

Moreover, there is no analysis regarding the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably

sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application does not contain a lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the possibility of increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

In conclusion, the lack of any evaluation regarding dark skies and nocturnal wildlife represents a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and unable to support a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, as it does not align with statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the key issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the deficiencies in the current application remain significant.

A thorough review reveals a lack of a complete and reliable evidential basis for determination. There are notable deficiencies in baseline data, the application employs an undefined design envelope, and it relies on unspecified mitigation measures. Furthermore, there is an absence of critical impact pathways, particularly regarding nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full comprehension of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment is a material oversight. Such deficiencies hinder the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal is directly at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that a net economic benefit cannot be evidenced. The cumulative effects of both offshore and onshore components have not been adequately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are present, and inconsistencies exist within these evaluations. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which invokes the precautionary principle and precludes a lawful conclusion that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The scale of the informational deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or exercise the relevant regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A3B76498

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 in accordance with the relevant marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and its accompanying documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The project is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing shoreline, relatively untouched environment, and rich cultural heritage. Concerns have arisen regarding the scale, design, and proximity of the development, raising questions about its alignment with statutory regulations, national policies, and sustainable development principles.

The application fails to establish an adequate evidential foundation necessary for a lawful decision. There is a notable absence of critical environmental data, while the existing baseline information is both limited and inconsistent. Furthermore, several elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures leads to an inability to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive or informed assessment of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Clear policy inconsistencies are evident, as the proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4. This is particularly concerning with respect to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they pertain to the statutory tests necessary for consent, undermining the competent authority's ability to ascertain the proposal's acceptability within policy parameters.

The unprecedented scale of the proposal raises significant issues, with large turbines proposed in close proximity to the shoreline, which poses serious concerns regarding landscape capacity, visual impact, and overall environmental consequences. When viewed collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for the proposed development is significantly flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the assessment's integrity is compromised, leaving both the public and the competent authority without a clear understanding of the potential environmental impacts that may arise from the actual construction.

Furthermore, the Environmental Impact Assessment Report does not adequately define mitigation measures, monitoring strategies, or management plans, as these are proposed to be established at a later stage. Seeking consent under these conditions means that there can be no meaningful evaluation of the effectiveness of these measures, nor can the residual impacts be properly assessed. This approach is procedurally unacceptable and goes against the fundamental objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly outlined before any determination is made.

There are notable evidential shortcomings present, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies lead to uncertainties concerning the scale and significance of the impacts, particularly when conclusions regarding negligible or non-significant effects are drawn without robust data to support them. The lack of comprehensive information hinders a clear understanding of cumulative and worst-case scenarios, creating scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application fails to meet the evidential standards required under the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly in relation to the safeguarding of biodiversity and environmental integrity, as it cannot confirm that all 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 strategies, and the existence of gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, ultimately leaving the competent authority without the necessary information to make an informed decision on the application.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned evaluation of realistic

alternatives based on their environmental effects, it merely outlines a narrative of the project's evolution. This method does not convincingly show that less harmful options have been adequately identified, assessed, and selected over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons among alternative offshore locations, development scales, or design configurations. Notably, the application does not provide evidence that the developer has earnestly considered placing turbines further offshore, where the visual, ecological, and coastal impacts could potentially be reduced. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in evaluating impact, the absence of such an analysis hinders any conclusion regarding whether the proposed siting truly represents the least damaging option.

These deficiencies are also evident in the assessments related to cable routing and landfall, where insufficient evidence has been provided to show that alternative routes have been thoroughly explored in order to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the approach to mitigation has not been designed effectively, relying instead on post-design measures.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, impeding the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal meets the criteria for sustainability or aligns with policy requirements.

From a policy standpoint, these shortcomings compromise adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The lack of a structured, comparative assessment represents 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 assessment of marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active, yet the methodologies employed have not adequately captured essential data regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight is the failure to appropriately assess otters, which are classified

as a European Protected Species. The application does not recognise their active use of coastal areas for foraging and movement, and it inadequately addresses their core foraging range and behavioural patterns. This neglect means the potential effects of construction disturbance, noise, and increased human activity remain unassessed, undermining any claims regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks suffers from serious deficiencies due to a reliance on aerial surveys, which can introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of the area. The omission of relevant data weakens the integrity of the baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than sound evidence. The lack of sufficient baseline data hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This absence of clarity creates uncertainty regarding the actual risks faced by marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the invocation of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the ornithological assessment fails to adequately demonstrate that these species will not be adversely affected. It does not robustly evaluate the implications of displacement, collision risk, or habitat loss, leading to significant gaps in evidence and internal inconsistencies that undermine its conclusions.

A critical contradiction exists within the application; the developer asserts that there will be no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which is only necessary when significant harm is

expected. This inconsistency raises questions about the reliability of the assessment and indicates that its conclusions are not backed by the underlying evidence. Furthermore, the assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and reliance on modelling approaches introduces uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk, creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential consequences for species with relatively small global populations. From a regulatory perspective, the application does not meet the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

These deficiencies also 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 directly conflicts with national policy. Collectively, the assessment is deemed unreliable due to methodological weaknesses, internal inconsistency, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not meet the statutory requirements necessary for support.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the application neglects to address intangible cultural heritage, including the

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted lacks transparency and comprehensiveness. A Social Impact Assessment was commissioned by the developer, which included focus group discussions with local residents. However, the absence of the full report creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to assess the potential social risks identified through this research.

Available summaries suggest that the local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts arise from direct engagement with the community, indicating that they are based on actual experiences rather than speculation. Nevertheless, the failure to publish the complete assessment prevents a thorough examination of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to the community's identity and cohesion, with a "cultural loss" noted in the

developer's own findings. Despite acknowledging these impacts, they have not been adequately incorporated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency further undermines the Environmental Impact Assessment process. An in-depth understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential foundation for weighing benefits against potential harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates adverse effects that have not been fully acknowledged. Without the full assessment, demonstrating compliance with this policy is not feasible.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a significant gap within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the receiving environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, exudes a strong sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that is irreversible.

Moreover, the application does not represent the extent of the visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to properly convey the level of impact or its importance in the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints.

Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This casts doubt on the assessment's reliability, suggesting that the visual impact may have been understated.

Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. These sites are treated as isolated elements, failing to recognise their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This represents not just a visual impact but a broader cultural and spatial harm that has not been sufficiently examined in the application.

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

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

Collectively, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies regarding the assessment of construction and pollution risks, which ultimately undermines the ability to properly evaluate potential environmental impacts. The application involves considerable seabed preparation and installation works in a dynamic Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be developed after consent, obstructing any meaningful appraisal of their potential effectiveness.

This approach is particularly troubling given the ecological sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to both sediment disturbance and contamination. While

the application does acknowledge risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without reliable modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these disturbances. This uncertainty also extends to the possible effects on already identified sensitive marine species and habitats within the broader assessment framework.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application hampers the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This not only introduces procedural risks but also weakens the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy mandates regarding environmental protection and water quality.

Collectively, the absence of specific mitigation measures, the failure to present detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These issues 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, which are at risk due to the inadequacies of the assessment regarding fisheries and marine life. The application does not provide a comprehensive evaluation of the ecological or socio-economic impacts, failing to demonstrate that these crucial habitats and activities can be preserved without significant disruption.

A critical concern is the assumption made in the application that fishing activities can be displaced without any negative consequences. There is a lack of evidence to support claims that alternative fishing grounds are available, accessible, and capable of handling the added pressure. This omission carries significant implications, as displacement could lead to overfishing in other areas and potentially result in wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods tied to them remain obscured.

Moreover, the proposal poses substantial risks to marine species, particularly through the underwater noise generated by construction activities. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life over considerable distances, notably affecting species such as dolphins. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious, yet the application tends to downplay the significance of these effects without adequate supporting evidence.

An inconsistency arises within the application itself, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously classifying these impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises substantial concerns regarding compliance with the Habitats Regulations, especially in instances where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to account for cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive 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 adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can exist alongside current marine users or avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not take into account the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected, yet they are evaluated separately, leading to a fragmented perspective that obscures the true magnitude of both environmental and socio-economic consequences.

Included in the onshore aspects are cabling across protected moorland, the construction of a substation near Stornoway, and the requisite access infrastructure that traverses sensitive landscapes. These activities entail excavation through areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which impedes a complete understanding of the project's overall

environmental footprint.

The exclusion or deferral of onshore impact assessments hampers the ability to properly evaluate cumulative effects. According to the Environmental Impact Assessment process, all parts of a project must be considered collectively; however, the disjointed treatment of offshore and onshore components results in a failure to fully comprehend their combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the effects on these habitats have been thoroughly assessed, nor does it show that suitable avoidance measures have been implemented. This raises a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal brings up important concerns related to carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this concern or provide assurance that the overall carbon balance remains beneficial.

Additionally, routing the infrastructure through active croft land may create conflicts with existing land use and legal rights. The application fails to present evidence that the required consents or processes have been initiated, which raises doubts about its deliverability and lawful implementation.

From a policy standpoint, the lack of a comprehensive assessment of the project as a whole and the failure to demonstrate protection for peatlands, habitats, and land use interests runs counter to the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the validity of the application.

In summary, the segregation of project components, the absence of a detailed assessment, and the lack of supporting evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, ultimately preventing 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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails fundamentally to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application recapitulates the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was determined. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not rectify past deficiencies.

The evidential basis for determination is both incomplete and unreliable. There are notable gaps in baseline data, an undefined design envelope is maintained, and unspecified reliance on mitigation measures persists. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failings are evident, notably the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage. It lacks evidence that health and wellbeing impacts are acceptable and fails to provide a net economic benefit due to insufficient tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, masking effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are both uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful determination of acceptable impacts.

Moreover, the proposal would induce 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 are all permanent effects that cannot be mitigated to an acceptable level.

Collectively, these deficiencies in the application render it procedurally and substantively unfit for determination. The significant information gaps, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

It would be a sin to do this to the moot beautiful part of the world. This is backed by pure greed and money.

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: E0953A44

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is proposed to be located 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 regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development are deeply rooted in the scale, proximity, and design of the proposal.

The application is lacking a sufficient evidential foundation for a lawful determination. Key environmental data is absent, the baseline information provided is both limited and inconsistent, and critical elements of the proposal remain undefined. The reliance on a flexible design framework obscures the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders their effectiveness unverifiable. Consequently, the documentation fails to facilitate a complete and informed understanding of the impacts on the environment, culture, or community, with assertions of negligible or non-significant effects lacking robust evidence.

There are substantial policy conflicts evident in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal raises significant concerns, particularly regarding the positioning of large turbines in close proximity to the shoreline, which could adversely affect landscape capacity, visual dominance, and the environment. In light of the insufficient information provided, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance, it is clear that the application is incomplete and cannot sustain a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in many ways and does not give a complete, clear, or trustworthy view of the potential environmental effects of the proposal. The flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the ability to apply a worst-case scenario consistently, undermining the assessment's integrity. As a result, the impacts described may not accurately reflect what will ultimately be constructed, making it difficult for both the public and the competent authority to grasp the true extent of environmental effects.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that are still undefined. Therefore, consent is requested based on the idea that any environmental harm will be dealt with later. This approach prevents a proper evaluation of effectiveness or assessment of remaining impacts. It is procedurally unacceptable to defer essential information to stages after consent, as it goes against the fundamental purpose of the Environmental Impact Assessment process, which requires that significant effects and mitigation are clearly established before any decision is made.

There are also notable deficiencies in the evidence presented, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without strong supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

As a result, the application does not satisfy the evidential standard set by 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. Furthermore, the proposal does not show compliance with National Planning Framework 4, which includes standards for biodiversity protection and environmental integrity, as it remains unproven that the impacts have been thoroughly assessed or that appropriate safeguards exist.

Overall, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These issues prevent a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot make a decision based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

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

habitat use. Consequently, the assessment lacks a solid evidential basis for impact evaluation.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is located 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. Unfortunately, the ornithological assessment accompanying the application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to adequately demonstrate that these vulnerable species will not be adversely affected, particularly in light of the risks associated with displacement, collision, and habitat loss.

A fundamental contradiction exists within the application itself, as the developer

claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying evidence. 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 methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the inadequate understanding of the behavioural responses of these birds. The siting of turbines within a recognised migratory corridor introduces a considerable risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor, nor does it consider 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, paired with data gaps and limitations of the modelling approaches, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle and prevents a lawful conclusion in favour of consent.

Moreover, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to convincingly show that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is severely lacking and does not truly capture the extent of change nor the sensitivity of the environment in question. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Furthermore, the application fails to accurately depict the magnitude of the visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and

remoteness. The assessment does not adequately communicate the significance of these impacts in relation to such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises the possibility that the true extent of the visual impact has been minimised, thus compromising the reliability of the assessment.

Moreover, there is a critical failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact; it represents a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, this proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The degree of change proposed is incompatible with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

Additionally, it is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic repercussions. The coastal waters off West Lewis host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to demonstrate how these vital habitats and activities can be preserved without significant disruption.

A critical concern lies in the assumption that fishing activities can be relocated without negative consequences. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressures that may arise. This oversight is particularly important, as displacing fishing efforts could lead to overfishing in other areas, which may result in broader economic ramifications for the local fishing fleet. In the absence of a well-supported and clear assessment, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, especially from the underwater noise generated during construction activities. High-energy hammer piling over extended periods is expected to create disturbances across considerable distances, which could affect species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns; yet, the application diminishes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a detailed examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not show compliance with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

Considering these points collectively, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment flawed and unreliable. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

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. However, the Environmental Impact Assessment lacks any evaluation of dark skies and nocturnal

wildlife, which constitutes a material omission. The proposal incorporates permanent red aviation lighting that is visible over extensive distances, resulting in a disruptive "wall of light" effect across the western horizon that would significantly alter the night-time environment.

There has been no assessment of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and the growing tourism sector focused on astro-tourism. The absence of consideration for these factors leads to a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a lack of analysis regarding the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and heightened collision risks. The application does not present any lighting impact assessment or phototaxis study, failing to investigate how aviation lighting may influence these species or contribute to increased mortality rates.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the

rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under an ostensibly stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls short.

There are significant gaps in the evidential basis for the application, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the proposed mitigation measures lack specification, and crucial impact pathways—including those affecting nocturnal wildlife, full onshore infrastructure, and tourism—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

The procedural aspects of the application also exhibit clear deficiencies. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a material omission, preventing the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unsuitable for determination.

Moreover, the proposal directly conflicts with National Planning Framework 4, as it does not sufficiently protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the absence of tourism impact modelling. A proper assessment of the cumulative impact of both offshore and onshore elements is lacking, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to confidently exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the missing information. A formal request is made for the outright refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

The impact on the marine environment will be devastating and as humans still do not have the necessary knowledge and science to fully understand the marine environment we absolutely need to stop destroying it.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 094D7D5E

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

The application also suffers from considerable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of the impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The deficiency of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is significantly inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is

characterised by its sensitivity and biological activity, yet the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for assessing impacts.

One crucial shortcoming involves otters, classified as a European Protected Species. The application neglects to appropriately recognise and evaluate their active use of coastal regions for foraging and movement. The failure to consider their core foraging ranges and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbances, noise, and increased activity. This gap undermines any assertions regarding the absence of significant effects on otters.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application demonstrates a critical lack of understanding regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity and characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This failure to engage meaningfully with the community undermines the validity of the assessment and does not align with established principles that emphasise participation in matters affecting cultural and environmental interests.

Moreover, the assessment neglects the significance of intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These vital elements are essential to the area's identity but are glaringly absent from the evaluation, leading to a substantial oversight. The cultural impact of the development cannot be comprehensively understood without addressing these factors.

The examination of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than appreciating heritage as an active, living component of the community, the application adopts a narrow view, treating it as isolated and static assets.

Key deficiencies arise in 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; however, they are categorised as static features in the assessment. This mischaracterisation ignores their ongoing use and meaning, as well as the development's impact on their setting, resulting in an incomplete evaluation of cultural effects and a disregard for their significance within community life.

A significant procedural failing is the lack 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 impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the application's inability to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application falls short of providing a sufficient basis for understanding the true cultural cost of the project.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the full extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic views, lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines positioned near the shoreline would create an industrial presence that is both continuous and dominant, leading to a

permanent and irreversible alteration of this landscape.

The representation of the visual changes resulting from the application is insufficient. Given the scale and close proximity of the turbines, they are set to dominate the views from residential zones, historical landmarks, and popular coastal areas. This intrusion would impact visual amenity directly and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the framework of such a sensitive landscape.

Methodological issues arise concerning the selection and display of visual viewpoints. Evidence indicates that the viewpoints presented may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to crucial cultural heritage sites and landscapes of high value. This raises concerns that the extent of visual impact may have been understated, thereby compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notably, locations such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The magnitude of change is incompatible with the obligation to maintain landscape character, visual amenity, and the context of culturally significant locations. The lack of a thorough worst-case analysis further diminishes any assertion of policy compliance.

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

In summary, the assessment does not accurately reflect the degree of impact, the sensitivity of the environment, or the interconnected relationships between landscape and heritage. These shortcomings preclude a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic effects. The coastal waters of West Lewis are home to a rich marine ecosystem and an active fishing industry, yet the application does not sufficiently demonstrate that these habitats and uses can be protected or sustained without major disruption.

One of the critical concerns is the assumption that fishing activities can be displaced without significant repercussions. The application lacks evidence that there are alternative fishing grounds which are accessible and can handle additional fishing pressure. This gap is particularly important, as the potential for displacement could lead to overfishing in other areas, with broader economic implications for the local fishing fleet. Without a comprehensive and evidence-based analysis, the impacts on fisheries and the livelihoods that depend on them remain unclear.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns; however, the application downplays these effects without providing adequate supporting evidence.

There exists an apparent contradiction within the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal approval.

Moreover, the assessment neglects to address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. 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 does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which precludes any conclusion that the proposal aligns with sustainable development principles.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It presents issues similar to those that caused the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still fails to address these crucial aspects.

The application lacks a thorough and reliable basis for determination. There are significant gaps in the baseline data, and it continues to employ an undefined design envelope. Additionally, it relies on unspecified mitigation measures and overlooks key impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of potential significant effects and residual impacts.

There are notable procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a significant omission. These shortcomings inhibit 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. It does not adequately protect biodiversity, natural places, and cultural heritage. Health and wellbeing impacts 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 cumulative impacts of offshore and onshore elements have not been properly evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to prove that adverse effects are excluded beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and making it impossible to legally conclude that impacts are acceptable.

The proposal would bring about considerable and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and have impacts on tourism, leading to permanent effects that cannot be mitigated to an acceptable level.

Overall, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, makes it impossible to reach a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

The Outer Hebrides are among the last truly unspoilt landscapes in the UK, valued for their dramatic coastlines, wildlife, and unique cultural heritage. Constructing a large-scale wind farm on the Isle of Lewis risks causing lasting damage to an environment that is both ecologically fragile and economically dependent on its natural beauty.

The visual impact alone would be significant. Turbines, access roads, and associated infrastructure would permanently alter the wild, remote character of the island — the very quality that attracts both residents and visitors. Tourism is a major part of the local economy, and many people come to Lewis specifically for its untouched scenery and tranquillity. Industrialising the landscape could damage the island's appeal and harm local businesses.

There are also serious environmental concerns. The Outer Hebrides are home to protected bird species, sensitive peatlands, and fragile coastal ecosystems. Construction and turbine operation could disrupt habitats and wildlife, while damage to peatland may release stored carbon, undermining the environmental benefits the project aims to achieve.

Renewable energy is important, but developments of this scale should not come at the expense of one of Scotland's most precious natural landscapes. The Isle of Lewis is not an empty space for industrial development — it is a unique environment that deserves long-term protection.

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: 68FBCCAE

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 application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. 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 robust cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, particularly in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. The adoption of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the proposal's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, dependence on undefined mitigation, evidential deficiencies, and clear non-compliance with policy reveal 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 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 inadequacy of the alternatives assessment is critical and fails to fulfil the statutory requirements of the Environmental Impact Assessment framework. The application

does not offer a structured and reasoned comparison of feasible alternatives based on their environmental consequences. Instead, it provides a narrative of how the project has evolved, which does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging alternatives.

There is a notable absence of transparent, evidence-based evaluations regarding alternative offshore locations, development scales, or design configurations. The developer has not convincingly explored the possibility of placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity and the significance of the proximity to the shore in determining impact highlight the necessity of such an analysis. Without it, one cannot conclude that the proposed siting is the least damaging option available.

Furthermore, this deficiency extends to the routing of cables and the assessment of landfall, as there is a lack of adequate evidence indicating that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually important sites like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, suggests that mitigation by design has not been implemented, leaving reliance on post-design mitigation measures.

Consequently, the application fails to illustrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, impeding the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a rigorous assessment of alternatives, it is impossible to determine if the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and lacks a comprehensive understanding of ecological receptors. This marine system is biologically active and highly sensitive, yet the data collected is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of species, leading to an assessment that cannot reliably inform evaluations of potential impacts.

One notable shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active foraging and movement patterns along the coast. By not considering their core foraging

range, the assessment fails to evaluate the potential impacts of construction disturbance, noise, and increased activity on these animals. This oversight undermines any conclusions drawn regarding significant effects on otters.

Additionally, there are serious deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This is further highlighted by established land-based observations that indicate these sharks frequently utilise these waters. The omission of such crucial data results in an incomplete baseline, which in turn weakens the conclusions drawn.

The methodological weaknesses indicate that any conclusions suggesting negligible or non-significant effects are based on unfounded assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits the meaningful assessment of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions. This introduces uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and the stipulations set out in National Planning Framework 4, as it fails to properly identify or assess protected species. This uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, it is not lawful to grant consent under these circumstances.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is severely deficient, particularly in acknowledging the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of recognising the ongoing social, cultural, and spiritual roles of heritage within the community, the application adopts a simplified perspective, treating cultural heritage as a collection of fixed, isolated assets.

A significant shortcoming is the handling of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice. However, the assessment erroneously categorises them as static features, neglecting their current use and significance while disregarding the potential impact of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects and overlooks their integration into community life.

Moreover, the assessment fails to consider intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity and are notably absent from the evaluation, indicating a significant gap in the assessment process. Without acknowledging these factors, the true cultural implications of the development remain unclear.

Further, there are critical concerns regarding community rights and the need for proper engagement. The Gaelic-speaking population, which possesses distinct cultural characteristics akin to those of Indigenous Peoples, has not been subjected to a process of Free, Prior and Informed Consent. The lack of meaningful engagement in this context undermines the credibility of the assessment and fails to adhere to established standards for participation in decisions that affect cultural and environmental interests.

A crucial procedural deficiency is the omission of a compliant Island Communities Impact Assessment, a requirement stipulated by the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic consequences for the island community. This alone renders the determination unlawful.

These shortcomings ultimately place the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The disregard for both tangible and intangible aspects of heritage, as well as the failure to recognise living cultural practices, marks a clear deviation from policy expectations.

Collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential void. The cultural repercussions of the development have not been adequately assessed, leading to a lack of a solid foundation for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the scale of change and sensitivity of the receiving environment. The coastal area of West Lewis is characterised by an open Atlantic horizon, a lack of development, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, thereby permanently and irreversibly transforming the landscape's character.

Furthermore, the proposal does not sufficiently represent the extent of this visual alteration. Due to the size and proximity of the turbines, they would overshadow views from residential properties, historic sites, and popular coastal areas, significantly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this impact or its

significance within such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Available evidence indicates that these viewpoints may inadequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk suggests that the actual magnitude of visual impact may have been underestimated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and various Scheduled Monuments, are integral to a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the way heritage assets are perceived and distancing them from their natural horizon. This signifies not merely a visual impact but a more profound cultural and spatial detriment that remains insufficiently assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with the National Planning Framework 4, particularly concerning the safeguarding of natural environments and historic assets. The scale of anticipated change contradicts the obligation to protect landscape character, visual amenity, and the context of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further weakens any argument of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and inescapable. As such, the resulting change is not merely significant but fundamental and permanent, beyond the capacity for reduction to an acceptable level through mitigation efforts.

In summary, the assessment falls short in accurately conveying the scale of impact, the environmental sensitivity, and the interconnected dynamics of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant concern due to the incomplete assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental effects. This development requires substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution

Prevention Plans. Instead, the application depends on mitigation and contingency measures that are intended to be formulated post-consent, thereby obstructing any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of disturbance and contamination from sediment. While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail regarding the prevention, control, or monitoring of these incidents.

There is also a notable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and appropriate mitigation are assessed prior to granting consent. The absence of such critical information renders a lawful determination impossible. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainties surrounding potential impacts render the assessment materially inadequate. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

The onshore components involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes. These operations necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential requirements. The issues central to this application echo those that led to the 2008 rejection of the Lewis Wind Power proposal, where the degree of industrialisation was deemed unacceptable. This current proposal

is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The application is lacking a complete and reliable evidential basis for decision-making. There are notable deficiencies in baseline data, the continued utilisation of an undefined design envelope, and an overreliance on unspecified mitigation measures. Moreover, it fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is insufficient and does not facilitate a thorough understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duties mandated by the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment constitutes a critical 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.

Additionally, the proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage, nor does it prove that impacts on health and wellbeing are acceptable. Furthermore, it lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, leaving the implications for peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks that may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

The proposal is likely to cause 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 connections, and the negative impacts on tourism represent permanent changes that cannot be mitigated adequately.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

Working offshore industry. Installing the infrastructure is a messy and time consuming operation. Where do the installing ships undertake port calls. Once the installation process is complete workers will still need to visit the field.

I don't expect they will take workers from the islands. Every one will be flown in. Using up valuable tourism accommodation..

The list is not exhaustive it directly impacts island life, the marine and birds surrounding the islands and even the views at night. A dark sky without red flashing lights. It's what people visit the Hebrides for. The remoteness and beauty. Other ways of creating power sources will be more beneficial.

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: E3555E34

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 submitted under relevant marine licensing and Environmental Impact Assessment regimes. The application raises significant concerns related to planning, environmental, cultural, and procedural matters, as identified in a review of the Environmental Impact Assessment Report and associated documents. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a solid evidential basis necessary for a lawful determination. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework used hinders a clear understanding of potential significant effects, and the unsubstantiated reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and significant. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency pertains particularly to biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements regarding the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests required for consent and weaken the capacity of the competent authority to determine that the development aligns with policy requirements.

The unprecedented scale of the proposal raises further concerns, with large turbines located close to the shoreline. This positioning creates significant issues relating to landscape capacity, visual dominance, and environmental impact. Overall, the combination of insufficient information, undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and does not support a lawful determination. In light of these factors, the precautionary principle should apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to provide a reliable assessment of the likely environmental effects of the proposed development. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the

application introduces considerable uncertainty. This approach compromises the integrity of the assessment, as it does not allow for a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately represent the actual development, which hinders both public understanding and the ability of the competent authority to gauge the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are yet to be defined. This reliance implies that consent is sought with the expectation that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies are clearly established before a determination is made.

Additionally, there are marked deficiencies in evidence, including gaps in baseline data and methodological limitations, alongside an overreliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information impedes a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. The precautionary principle is especially pertinent in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, specifically regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is a significant concern, as it does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. The application provides a narrative account of the project's development rather than a structured, reasoned comparison of viable alternatives based on their environmental impacts. This failure raises questions about whether less harmful options have been adequately identified, assessed, and prioritised over more damaging solutions.

Moreover, the lack of a transparent, evidence-based comparison extends to the

assessment of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where there would likely be reduced visual, ecological, and coastal impacts. The sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in determining impacts further highlight the absence of this analysis, preventing any conclusion that the proposed siting is the least damaging option available.

Concerns about deficiencies also relate to cable routing and landfall assessment. There is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the concept of mitigation by design has not been considered, leading to an overreliance on post-design mitigation measures.

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission, contributing to the overall assessment that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally deficient, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is recognised for its biological sensitivity and activity; however, the incomplete baseline data and inadequate methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential basis to evaluate potential impacts.

One significant oversight is the treatment of otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active utilisation of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently evaluated. As a result, any conclusions drawn about the absence of significant effects

on otters are fundamentally undermined.

Additionally, there are notable deficiencies in the assessment of basking sharks, which are exacerbated by reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underreport the species' presence, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to properly incorporate or consider such data contributes to an incomplete baseline, further weakening the reliability of the conclusions drawn.

The limitations of the methodologies employed result in conclusions regarding negligible or non-significant effects being derived from assumptions rather than robust evidence. Moreover, the absence of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been conducted, creating a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application presents significant gaps in evidence and contains internal inconsistencies that fundamentally undermine its conclusions. Notably, 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, to the required evidential standard, that these species will not be adversely affected. The development site is situated within key foraging areas and migratory pathways, yet there is an inadequate evaluation of the implications related to displacement, collision risk, or habitat loss.

A critical contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on

seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly addressed, and reliance on modelling approaches introduces considerable uncertainty, particularly for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is incomplete and behavioural responses are not fully understood.

The proposed siting of turbines within a recognised migratory corridor poses an additional and substantial risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term consequences of sustained mortality within this corridor, nor the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby preventing a lawful conclusion in favour of consent. Additionally, the identified deficiencies represent non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment's internal inconsistencies, methodological weaknesses, and lack of adequate evidence contribute to its overall unreliability. These issues hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is significantly flawed, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape wherein environment, tradition, language, and community are interconnected. Rather than appreciating heritage for its evolving social, cultural, and spiritual significance within the community, the application adopts a simplistic view, perceiving it as a collection of unchanging, isolated assets.

An important shortcoming relates to the treatment of culturally significant sites, including the cemeteries at Bragar, Dalmore, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are erroneously classified as static features. This oversight neglects their ongoing usage and meaning, as well as the potential impact of development on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural consequences and overlooks their vital role in community life.

Additionally, the assessment inadequately addresses intangible aspects of cultural

heritage, such as the Gaelic language and the longstanding connection between the coastal community and its environment. These elements are crucial to the area's identity but are notably absent from the evaluation, which constitutes a significant oversight. The cultural ramifications of the proposed development cannot be fully comprehended without these considerations.

There are also substantial concerns surrounding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity aligned with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of public participation in decisions that affect cultural and environmental matters.

A further procedural issue is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination unfeasible.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to recognise both tangible and intangible heritage, alongside a disregard for living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available, resulting in a significant evidential gap. This lack of transparency not only inhibits public understanding but also affects the competent authority's ability to evaluate the full extent of social risks identified in the developer's own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement with the community and are not speculative. However, the inability to access the full assessment hampers proper scrutiny of these findings and restricts an informed decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" recognised in the developer's findings. Despite this acknowledgement, these significant impacts have not been adequately reflected in the

main application. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, undermining the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is essential for developments of this magnitude, particularly when community character and functionality could be affected. The application, in failing to provide comprehensive data, does not present a complete evidential basis for weighing the benefits against potential harm.

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

The implications of this procedural deficiency 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 absence represents a material omission in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the failure to disclose the full Social Impact Assessment, combined with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This lack of comprehensive information obstructs a lawful determination, further reinforcing the view that the application is inadequately supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines would be situated in close proximity to the shoreline, introducing a continuous industrial presence that would fundamentally alter this character. This change would result in a permanent and irreversible transformation of the landscape.

The application fails to properly assess the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the natural and remote qualities of the area. The assessment does not adequately convey the significance of these impacts on such a sensitive landscape.

There are also concerns regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This may lead to an understatement of the visual impact, calling into question the reliability of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship

between landscape, seascape, and cultural heritage. Important 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. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

The proposed industrialisation of the seascape would sever these vital connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This would not only create a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change proposed is incompatible with safeguarding the landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any claims of policy compliance.

Additionally, the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation efforts.

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

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

There is a troubling inconsistency in the application itself, acknowledging the need for licences to allow harm to European Protected Species while simultaneously claiming

that the impacts are negligible. This contradiction undermines the validity of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when harm is anticipated to an extent that would require legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not fully account for the impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated separately. This fragmented approach obscures the true magnitude of environmental and socio-economic effects.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. Without a thorough assessment of these impacts, the application fails to provide a complete understanding of the project's environmental footprint.

By not including or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; yet, the distinct treatment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and communities.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been

considered. This creates a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is indeed advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises issues regarding the feasibility and lawful execution of the project.

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

In summary, the division of project components, the absence of a comprehensive assessment, and the lack of evidence concerning 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 proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This significant alteration of the night-time environment threatens the exceptionally dark skies of the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impacts of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the crucial role dark skies play in the region's identity and in emerging sectors such as astro-tourism.

Moreover, there is a complete lack of evaluation regarding the impact on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting may affect these species or contribute to increased mortality rates. This gap is further compounded by the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activity or the associated risks. Vulnerable species, such as Kittiwakes, which forage or migrate at night, remain unassessed in terms of their risk of disorientation from artificial lighting.

Without a comprehensive assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The failure to meet the evidential standard required to exclude adverse effects beyond

reasonable scientific doubt invokes the precautionary principle, thereby precluding a lawful determination. Additionally, from a policy standpoint, this omission contradicts National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the thorough assessment of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In conclusion, the lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application neglects to properly assess the impacts on tourism, which is a vital component of the Isle of Lewis economy, and it fails to evaluate the economic and social consequences for this key sector. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and the sense of remoteness that attracts visitors. While the application states that 86% of tourists are drawn to the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or their overall economic contribution.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and contributing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the wider economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect an established and expanding sector.

Furthermore, the assessment overlooks the importance of environmental quality to tourism, including the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortfall, creating a significant gap in understanding the potential impacts on a growing segment of the local economy.

In an island community that faces challenges regarding economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of communities. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, contrary to 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 necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a

growth sector, failing to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors that influence visitor behaviour, and the disregard for the economic dependency of the island culminate in a substantial evidential gap. This inhibits a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as dictated by statutory responsibilities, national policy, and evidential standards. It mirrors the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This application is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for determining the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the application continues to rely on an undefined design envelope. The proposed mitigation measures remain unspecified, and critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or residual impacts.

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

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

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

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

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

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

Additional Comments

Lewis is a beautiful, unspoilt Island which needs to be preserved. Please reconsider where the wind turbines can be placed or alternative sources of green energy (wave turbines).

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: 23AB234A

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documentation, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal presents unprecedented scale, with large turbines planned in close proximity to the shoreline, raising significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. The application lacks a sufficient evidential basis for lawful determination. Critical environmental data is absent, baseline information provided is limited and inconsistent, and essential elements of the proposal remain undefined. The employment of a flexible design framework obstructs a clear understanding of likely significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the submitted documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The combined effect of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is crucial that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate. It does not provide a reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine

system, yet the baseline data is incomplete. The methodologies used fail to adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant oversight is the failure to properly assess otters, a European Protected Species, and their use of coastal areas for foraging and movement. The application does not consider their core foraging range and behavioural patterns, which means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated. This oversight undermines any conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks has notable deficiencies. The reliance on aerial surveys introduces significant 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 show frequent use of these waters. The failure to incorporate or adequately consider this data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, such as seasonal variation and interactions within the wider ecosystem. This creates uncertainty about the true risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to properly identify or assess protected species. The resulting uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, engaging the precautionary principle. Given these circumstances, consent cannot be granted lawfully.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies 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 ornithological assessment associated with this application is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that weaken its conclusions. The assessment fails to adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not robustly evaluated.

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

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

Additionally, the identified deficiencies signify a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. Such deficiencies prevent a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally inadequate. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are interconnected. Instead of acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating it as a series of isolated, static assets.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet the assessment categorises them as mere static

features. This mischaracterisation disregards their continued use and significance within the community, leading to an incomplete evaluation of cultural impacts.

Additionally, the application neglects to assess intangible cultural heritage, including the Gaelic language and traditions, as well as the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity, yet they are entirely absent from the assessment. This oversight represents a significant omission, which prevents a proper 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, recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified through the developer's own research.

Residents have reported experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. However, the inability to access the complete assessment limits scrutiny of the findings and constrains decision-making regarding their

significance.

Additionally, there are indications that the proposal threatens community identity and cohesion, with the developer's own findings highlighting concerns over “cultural loss.” Despite these findings, the impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency is detrimental to the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality are at stake. Without the complete dataset, the application fails to provide an adequate evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the available evidence suggests the existence of adverse effects that have not been fully revealed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

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

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, landscape, and seascape impacts is significantly lacking and does not sufficiently address the scale of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an unobstructed Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposal to install large-scale turbines in close proximity to the shore would establish a continuous and prominent industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately conveys the extent of the visual changes that would occur. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would detrimentally affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to adequately express the significance of these

impacts within such a sensitive landscape context.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that the viewpoints chosen may not represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and landscapes of high value. This raises the possibility that the scale of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, there is a significant shortcoming in the assessment's failure to analyse the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, resulting in a deficient evaluation of their impact and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are appreciated and breaking their connection to the natural horizon. This represents not only a visual concern but also a deeper cultural and spatial detriment that the application has not sufficiently addressed.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The extent of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case analysis further challenges any assertions of policy conformity.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be prominent and inescapable. Thus, the resulting changes are fundamentally permanent, rather than reducible to an acceptable level through mitigation measures.

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 reinforce the conclusion that the proposal is not aligned with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises alarm, particularly when considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application does acknowledge risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring strategies.

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries is fundamentally flawed and does not adequately evaluate the ecological and socio-economic implications of the proposal. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry. However, the application fails to guarantee that these habitats and activities will be preserved or sustained without considerable disruption.

One critical flaw in the application is the assumption that fishing activities can be shifted without negative repercussions. There is no evidence provided that alternative fishing grounds are both available and capable of sustaining the increased pressure. This gap is critical, as displacing fishing efforts risks overfishing in other areas,

potentially leading to wider economic repercussions for the local fishing community. Without a thorough and evidence-based assessment, the impacts on both fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over considerable distances, negatively impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is deeply concerning; yet, the application minimizes these impacts without providing adequate supporting evidence.

In addition, the application reveals a troubling inconsistency: while it acknowledges the necessity of licenses to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction casts doubt on the validity of the assessment and raises important questions about adherence to the Habitats Regulations, especially given the anticipated harm that may require legal authorisation.

The failure to account for cumulative impacts, which arise from various pressures such as habitat disturbance, noise, and displacement of fishing activities, further complicates the assessment. Without a thorough evaluation of these combined effects, it is impossible to ascertain the total impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application lacks evidence of compliance with National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the project constitutes 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 untrustworthy. These shortcomings hinder a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application under consideration exhibits significant shortcomings in its assessment of onshore infrastructure, which is essential to understanding the overall impact of the integrated project. The separation of offshore turbines and onshore works leads to an incomplete evaluation, obscuring the true extent of environmental and socio-economic repercussions. The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary 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 ecologically delicate habitat. The absence of a thorough assessment regarding these impacts prevents an accurate understanding of the project's total environmental footprint.

Moreover, the failure to properly assess onshore impacts inhibits a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates the consideration of all project components in unison; however, the existing separation of onshore and offshore elements results in an insufficient understanding of their collective impacts on peatlands, habitats, and local communities. There are notable risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void concerning biodiversity protection.

Further concerns arise regarding the carbon balance associated with this proposal. Disturbances to 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 matter or demonstrate that the overall carbon balance is advantageous. Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no substantiation that the requisite consents or processes have been initiated, which raises serious concerns regarding the deliverability and legality of implementation.

From a policy standpoint, the disjointed assessment of the project and the lack of demonstrated protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that potential impacts can be avoided or mitigated further diminishes the credibility of the application. Collectively, the fragmented approach to project components, the absence of comprehensive assessment, and the lack of evidential support for environmental and land use impacts render this portion of the application incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment lacks any evaluation of these dark skies and their significance. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This change would significantly alter the night-time environment, yet the application fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors.

The omission is particularly concerning given the rising importance of dark skies for the local identity and the emerging sector of astro-tourism. Furthermore, the proposal does not address the potential consequences for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions.

Without a lighting impact assessment or a study focused on phototaxis, the application does not adequately consider how the aviation lighting could affect these species or contribute to higher mortality rates.

This failure is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks the nocturnal behaviours and associated risks of the wildlife. For instance, Kittiwakes may forage or migrate at night, making them susceptible to disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific data related to night-time activity creates a crucial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions are at odds with National Planning Framework 4, which emphasises the need to protect natural places and maintain environmental quality. Additionally, the lack of consideration for night-time character undermines the comprehensive assessment of landscape and seascape impacts.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete, failing to support a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a fundamental failure to fulfil the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This proposal reflects the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, specifically the unacceptable scale of industrialisation. Despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not provide a complete or reliable evidential basis for determination.

Critical gaps in baseline data exist, compounded by the continued use of an undefined design envelope and reliance on unspecified mitigation measures. Additionally, key impact pathways, including those concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects or residual impacts.

There are evident procedural failures, including the lack of a compliant Island Communities Impact Assessment, which violates statutory duties under the Islands

(Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4, failing to demonstrate protection of biodiversity, natural places, and cultural heritage. It does not show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of both offshore and onshore components has not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant, with assessments concerning marine ecology, seabirds, protected species, and marine mammals being incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met. This engages the precautionary principle and precludes a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, along with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate regulatory provisions to require the submission of the missing information.

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

Additional Comments

I do not live in the direct vicinity of this potential project but, having lived on this island all my life, I feel it is incumbent of me as an islander to support the rejection of this project and, in doing so, protect our unique landscape, our way of living, our past, and our present.

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The coastal communities, and the people who live in them will, overnight, lose the uniqueness of what makes these communities so incredibly special to both live and work in; not to mention the disruption throughout the construction phase that will almost certainly impose on their mental health and general wellbeing.

Whatever positive financial impacts this may have on both our coastal communities and wider island communities, the long term impacts on the quality of life (we are all so

very fortunate to experience and hold dearly) could be devastatingly negative; we are immensely proud of who we are, where we come from, our heritage, our culture, our strong sense of being unique, and all the joy and happiness that brings, that we should do everything we can to protect that, not just for ourselves, but for our children, our children's children, and beyond.

From an environmental PoV, I simply cannot foresee anything but the destruction of a unique habitat, that will forever blight the landscape and potentially destroy the immediate ecosystem and surrounding areas for decades to come

We are fortunate to live in one of the most beautiful places on planet earth, living in harmony alongside the best and worst of what living in the unique environment of the Outer Hebrides is all about; we have embraced this for centuries and we will continue to embrace it for centuries to come...it is rightfully 'ours' and I strongly believe, it should never be 'for sale'.

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: 21C665A0

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and its supporting documentation, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal presents unprecedented scale, with large turbines planned in close proximity to the shoreline, raising significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. The application lacks a sufficient evidential basis for lawful determination. Critical environmental data is absent, baseline information provided is limited and inconsistent, and essential elements of the proposal remain undefined. The employment of a flexible design framework obstructs a clear understanding of likely significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the submitted documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The combined effect of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is crucial that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in many ways and does not give a complete, clear, or trustworthy view of the potential environmental effects of the proposal. The flexible Project Design Envelope, which does not commit to specific

turbine sizes, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the ability to apply a worst-case scenario consistently, undermining the assessment's integrity. As a result, the impacts described may not accurately reflect what will ultimately be constructed, making it difficult for both the public and the competent authority to grasp the true extent of environmental effects.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that are still undefined. Therefore, consent is requested based on the idea that any environmental harm will be dealt with later. This approach prevents a proper evaluation of effectiveness or assessment of remaining impacts. It is procedurally unacceptable to defer essential information to stages after consent, as it goes against the fundamental purpose of the Environmental Impact Assessment process, which requires that significant effects and mitigation are clearly established before any decision is made.

There are also notable deficiencies in the evidence presented, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without strong supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

As a result, the application does not satisfy the evidential standard set by 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. Furthermore, the proposal does not show compliance with National Planning Framework 4, which includes standards for biodiversity protection and environmental integrity, as it remains unproven that the impacts have been thoroughly assessed or that appropriate safeguards exist.

Overall, the combination of an undefined design envelope, lack of specified mitigation, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These issues prevent a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot make a decision based on the information submitted.

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 of the proposed development raises significant concerns regarding its reliability due to substantial internal inconsistencies and methodological weaknesses. It is crucial to highlight that the application fails to provide adequate evidence that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

A fundamental contradiction exists within the application itself; while the developer asserts that there are no significant adverse effects, they simultaneously present a

case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Furthermore, the methodologies used in the assessment are likely to underestimate mortality rates, especially for species like Kittiwakes and Fulmars, where baseline data is lacking and behavioural responses remain unclear.

The positioning of turbines within a recognised migratory corridor presents an additional risk, as it creates a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. There has been insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential repercussions on species that have relatively small global populations.

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

Moreover, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these critical seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally flawed, characterised by internal inconsistencies, inadequate methodologies, and a lack of sufficient evidence. These issues collectively hinder a thorough evaluation of impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, neglecting the West Lewis coastline as a living cultural landscape. This area is defined by a connection between environment, language, tradition, and community, yet the application reduces heritage to a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual roles.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places for burial and spiritual practice; however, they are characterised in the assessment as mere static features. This oversight disregards their continued use and the implications of development on their surrounding environment, leading to an incomplete understanding of cultural effects and their importance to community life.

Moreover, the assessment omits intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are essential to the area's identity yet receive no acknowledgment, resulting in a significant oversight. The cultural impact of the development cannot be fully grasped without factoring in these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and characteristics recognised as those of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, undermining the assessment's legitimacy and failing to adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices mark a clear violation of policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application falls short of providing a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with this proposal is severely inadequate and lacks the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that includes feedback from local residents; however, the complete report has not been made available. This oversight creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own research.

Summaries that are currently accessible reveal that residents are already facing measurable stress, anxiety, and concerns due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and should not be viewed as speculative. However, the absence of the full assessment obstructs thorough scrutiny of these findings and limits the capacity to assess their significance in the decision-making process.

Moreover, the proposal is perceived as a potential threat to community identity and cohesion, with the developer's own findings citing "cultural loss." Unfortunately, these impacts have not been sufficiently considered within the main application, nor have they been given the weight they deserve. The decision to withhold the full Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and function are at stake. The failure to provide the complete dataset means the application does not furnish a solid evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not meet the requirements of National Planning Framework 4 concerning health and wellbeing. It is essential that developments promote positive health outcomes and mitigate harm. However, the existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications of this situation are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission represents a material flaw within the application, resulting in a failure to satisfy the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual effects reveals significant deficiencies that do not properly reflect the scale of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is marked by its open Atlantic horizon and undeveloped nature, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would introduce a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape.

The application underestimates the magnitude of the visual change expected. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the qualities of naturalness and remoteness that define the area. The assessment fails to adequately communicate this level of impact and its significance within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially in relation to crucial cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Moreover, the application neglects to assess the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, failing to acknowledge their interdependence, which leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This creates not just a visual impact but also broader cultural and spatial harm that the application does not adequately address.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be rendered acceptable through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The 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 application exhibits a troubling contradiction, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, particularly in instances where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic consequences. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to convincingly demonstrate that these

essential uses and habitats can be preserved or maintained without considerable disruption.

A critical issue is the presumption that fishing activity can be relocated without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or able to endure added pressure. This significant omission poses risks of overfishing in other locations, which may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces considerable risks to marine species, especially through the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, affecting species such as dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application tends to downplay the importance of these effects without adequate supporting evidence.

The assessment also neglects to consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

In summary, the deficiencies in the assessment—including the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions—render it incomplete and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves onshore infrastructure that has been inadequately assessed, failing to consider the full range of impacts arising from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland and the construction of a substation near Stornoway, are intrinsically linked to the offshore turbines. This assessment is fragmented, obscuring the true scale of both environmental and socio-economic effects.

Significant onshore activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically

sensitive habitat. The absence of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint. By deferring or excluding the evaluation of onshore impacts, the application fails to facilitate a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal raises substantial concerns regarding sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection. Moreover, the disturbance of peatland could release stored carbon, thereby generating a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance is maintained as beneficial.

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

From a policy standpoint, the failure to conduct a holistic assessment of the project and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. In conclusion, the separation of project components, the lack of comprehensive assessment, and the absence of evidence on environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies in relation to the area's identity and the emerging sector of astro-tourism cannot be overstated. Without proper assessment, this omission leaves a crucial void in understanding the landscape and environmental implications.

The lack of evaluation extends to the impacts on nocturnal wildlife, with no assessment of how artificial lighting may affect species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are susceptible to phototaxis, potentially leading to disorientation and a heightened risk of collisions. The application does not include any lighting impact assessment or phototaxis study, resulting in a failure to consider the effects of aviation lighting on these species and their potential mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated 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 creates a critical gap in understanding ecological impacts.

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

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant 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 current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses 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 conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

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

In summary, the application is both 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. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

Additional Comments

This should not be happening anywhere, it destroys land and wildlife, they are also a massive eye sore. It is not fair for the locals or the local wildlife to be disturbed by selfishness, the locals don't want this as much as the rest of the world.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: BA7F2E3B

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 appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the potential environmental effects

associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the integrity of the assessment is compromised, and the impacts presented may not accurately reflect the development that will ultimately be constructed. This situation prevents both the public and the competent authority from grasping the true extent of the environmental effects involved.

Furthermore, the application heavily relies on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation be clearly identified prior to determination.

Additionally, there are substantial evidential deficiencies within the report. These include gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, this leads to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate adherence to the National Planning Framework 4, which includes mandates regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed development fails to adequately assess alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible alternatives based on their environmental impacts, the application presents a narrative of the project's evolution.

This method does not sufficiently show that the developer has identified, assessed, and chosen less harmful options over more damaging ones.

A notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations exists. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline, as well as the significance of proximity to shore in assessing impact, this lack of analysis hinders the ability to conclude that the proposed siting is the least damaging option.

Moreover, the shortcomings are evident in the assessments of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly examined to avoid or lessen effects on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis illustrate that mitigation by design has not been incorporated, leading to an overreliance 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 indicates a failure to adhere to the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies detract from compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that leads to the conclusion that the application has not undergone sufficient evaluation and cannot justifiably support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally flawed. It lacks a thorough understanding of the ecological receptors within the West Lewis coastal environment, which is both sensitive and biologically active. The baseline data used in the assessment is incomplete, and the methodologies employed do not adequately capture information about species presence, behaviour, and habitat use. Consequently, the assessment cannot provide a reliable basis for evaluating potential impacts.

A significant issue is the handling of otters, which are a European Protected Species. The application does not adequately acknowledge their use of coastal areas for foraging and movement. By failing to assess their core foraging range and behavioural patterns, the application does not properly evaluate the potential impacts of

construction disturbances, noise, and increased activity. This oversight undermines any claims of no significant effects on this species.

In addition, the assessment of basking sharks suffers from serious deficiencies. The reliance on aerial surveys introduces a substantial detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks compared to established land-based observations that show frequent use of the area. The failure to integrate or appropriately consider this data further weakens the baseline and the reliability of the conclusions drawn.

These methodological shortcomings mean that the conclusions regarding negligible or non-significant effects are based on assumptions, not solid evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, activating the precautionary principle. Therefore, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, revealing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. Situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, the proposed development fails to adequately demonstrate that these species, many of which are already in decline, will not face adverse effects. Critical foraging areas and migratory pathways are located within the development site, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss.

There exists a glaring contradiction in the application. While the developer asserts there will be no significant adverse effects, they simultaneously put forth a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious concerns about the assessment's reliability, suggesting that the conclusions drawn are unsupported by the evidence provided. Furthermore, there is a lack of sufficient evidence to conclude that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. The assessment does not fully account for the critical importance of these feeding grounds, and the reliance on modelling methods creates uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Methodological shortcomings may lead to an underestimation of mortality, especially in areas where baseline data is lacking and where the behavioural responses of species are not comprehensively understood.

The placement of turbines within a recognised migratory corridor introduces a substantial risk, acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality in this corridor and the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential standards necessary to affirm no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of being beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that supports consent.

Moreover, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence. As a result, it ultimately fails to meet the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development does not adequately assess the cultural heritage and identity of the community, particularly along the West Lewis coastline, which is a vibrant cultural landscape where language, tradition, community, and environment are deeply intertwined. The application takes an overly simplistic view of heritage, treating it as a collection of isolated assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual observance, yet the assessment categorises them as static features, overlooking their continued significance and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and disregards the cemeteries' integral role in community life.

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and its coastal environment. These elements are essential to the area's

identity, yet they are entirely omitted from the evaluation, highlighting a crucial gap. The cultural impact of the proposed development cannot be fully comprehended without addressing these factors.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation concerning cultural and environmental issues.

Additionally, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the complete Social Impact Assessment significantly hinders a thorough evaluation of social impacts, health, and wellbeing, resulting in a lack of transparency that is essential for a lawful review. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a notable evidential gap, limiting both public awareness and the competent authority's understanding of the social risks uncovered by the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the comprehensive assessment, proper scrutiny of the findings is impossible, thereby constraining the ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with concerns regarding "cultural loss" highlighted in the developer's findings. Despite this recognition, these social impacts have not been adequately

addressed in the main application or afforded the appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. To fully grasp the social, economic, and health implications of developments of this magnitude, particularly regarding community character and functioning, a complete dataset is vital. The current application does not provide a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development proposals must promote positive health outcomes and avoid adverse impacts. However, the evidence available points to existing detrimental effects that have not been transparently communicated. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application, failing to satisfy the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The application for large-scale turbines in close proximity to the shoreline would introduce 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 does not sufficiently represent the scale of change or the sensitivity of the receiving environment.

There are significant concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially in relation to cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

The application also fails to examine the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape

setting linked to the Atlantic horizon. The assessment treats these sites as isolated entities without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

Furthermore, the industrialisation of the seascape would disrupt these relationships and alter the context in which heritage assets are experienced. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy perspective, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. The absence of a robust worst-case assessment further weakens the claim of compliance with policy requirements.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making any change fundamentally permanent rather than reducible to an acceptable level through mitigation. Collectively, these deficiencies highlight the failure 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 assessment of construction and pollution risks within the application is notably incomplete, failing to provide the necessary detail for evaluating potential environmental effects. Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that would be formulated after consent, which undermines the ability to meaningfully assess their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the assessment of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is in conflict with the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to consent; without such information, a lawful determination cannot be achieved. The application additionally fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally deficient. These shortcomings inhibit a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, which raises serious concerns about the potential impacts on the local ecosystem and economy. The waters off the West Lewis coast host a rich marine ecosystem and a vital fishing industry; however, the proposal fails to demonstrate how these crucial habitats and activities can be preserved without causing substantial disruption.

One major concern is the flawed assumption that fishing operations can be displaced without adverse effects. There is a lack of evidence supporting the availability or accessibility of alternative fishing grounds that could sustain the additional pressure resulting from displacement. This gap is critical, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the true impacts on fisheries and community livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended timeframe is expected to disturb marine life over large distances, notably impacting populations such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; nevertheless, the application downplays the seriousness of these effects without adequate justification.

The assessment also exhibits contradictions, particularly in acknowledging the need for

licenses to harm European Protected Species while simultaneously characterising impacts as negligible. This inconsistency undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, especially given that harm is anticipated to a level that would require legal authorisation.

Furthermore, there is a failure to account for cumulative impacts resulting from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic context.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, thereby failing to confirm that the proposal constitutes sustainable development.

Overall, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment indicate that it is incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development 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 is concerning, particularly given the West Lewis coastline's exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism potential.

The Environmental Impact Assessment is significantly lacking, as it does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly alarming considering the growing importance of dark skies for emerging tourism sectors such as astro-tourism. Such omissions result in clear gaps in the overall landscape and environmental evaluation.

Moreover, there is no examination of how these lighting changes may impact nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including the risk of increased mortality, have not been considered.

This critical omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting, yet this risk remains

unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding its compliance with sustainable development principles when evaluated against statutory obligations, national policy, and evidential requirements. It mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these critical issues.

There are significant shortcomings in the evidential basis for the application. It lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Key impact pathways, particularly regarding nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects, have been overlooked. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Furthermore, there are evident procedural deficiencies. The absence of a compliant Island Communities Impact Assessment contravenes the statutory duties outlined in the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a material oversight. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to illustrate that health and wellbeing impacts are

acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of offshore and onshore elements have not been adequately assessed, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and barring a lawful conclusion on the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with policy and unresolved environmental risks, hinder the ability to make a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent based on these grounds or invoke the necessary regulatory provisions to mandate the submission of the required 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: C01B5A08

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. An analysis of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly in relation to its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is limited and inconsistent. Many key aspects of the proposal remain undefined. The reliance on a flexible design framework impedes a clear understanding of the likely significant effects, while the dependence on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are apparent and substantial conflicts with existing policies. 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 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 hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant challenges, with large turbines located in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. When considering the insufficiency of information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it becomes clear that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a deeply concerning reliance on an undefined Project Design Envelope, lacking any firm commitment to specific turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty, hindering the ability to apply a worst-case scenario consistently. As a result, the Environmental Impact Assessment Report fails to deliver a full, transparent, or reliable account of the likely environmental effects of the proposal. The implications of this deficiency are profound, as the assessment's integrity is compromised, preventing both the public and the competent authority from fully grasping the true extent of the environmental impacts.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed later undermines 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 fundamental purpose of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to determination.

Compounding these issues are significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn. The absence of sufficient information not only obscures a clear understanding of cumulative and worst-case impacts but also introduces scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it cannot establish that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an unspecified design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These substantial 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 assessment of alternatives presented in the application is materially inadequate and fails to meet the statutory requirements set forth by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the submission primarily details the evolution of the project. This method does not adequately demonstrate that less

harmful options have been properly identified, assessed, and prioritised over more damaging solutions.

There is a notable lack of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not illustrate that the developer has earnestly considered positioning turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be less severe. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in evaluating impact, the absence of such analysis hinders any conclusion regarding whether the proposed siting is indeed the least damaging option available.

These inadequacies further extend to cable routing and the assessment of landfall, with insufficient evidence provided that alternative routes have been thoroughly explored to prevent or minimise effects on sensitive receptors. This encompasses locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been effectively employed, resulting in a reliance on post-design measures for mitigation.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, thereby preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The ecological assessment provided lacks the necessary completeness and reliability to understand the ecological receptors in the West Lewis coastal environment. This region is a biologically active marine system, yet the methodologies used have not sufficiently captured the presence, behaviour, and habitat use of marine species. Consequently, the assessment fails to deliver an evidential basis for evaluating potential impacts.

Significant shortcomings are evident in the treatment of otters, a European Protected Species. The assessment does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and

behavioural patterns, the potential impacts from construction activities, noise, and increased human presence are not thoroughly evaluated. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Similar deficiencies are noted in the assessment of basking sharks. The reliance on aerial surveys leads to a substantial detection bias, particularly given the conditions in the Atlantic. This methodology likely underrepresents their presence, especially when contrasted with land-based observations that indicate these waters are used frequently by the species. The failure to integrate or appropriately consider such information contributes to an incomplete baseline and diminishes the credibility of the findings.

These methodological weaknesses result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted appropriately. The uncertainty generated prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and highlight the overall lack of a sufficient evidential foundation for the application.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns due to its fundamental contradictions and methodological weaknesses. It fails to provide adequate evidence regarding the impact on internationally important seabird populations found along the west coast of the Isle of Lewis, many of which are already experiencing decline. The application does not convincingly demonstrate that these species will remain unaffected, particularly given the site's location within key foraging areas and migratory pathways.

There is a significant lack of robust evaluation concerning crucial issues such as displacement, collision risk, and habitat loss. Moreover, the developer's assertion of no significant adverse effects contradicts the simultaneous argument for a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are unsupported by sound evidence.

The methodologies utilised in the assessment appear to underestimate potential mortality rates, especially for species like Kittiwakes and Fulmars that are already in severe decline. The assessment also fails to appropriately consider the implications of placing turbines in a recognised migratory corridor, effectively creating barriers for species that migrate between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, particularly for species with relatively small global populations, have not been adequately addressed.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. Data gaps, contradictory conclusions, and limitations in the modelling approach indicate that the standard of beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion in favour of consent.

These deficiencies also represent a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable, marked by internal inconsistencies and a lack of sufficient evidence, which undermines the ability to accurately evaluate impacts and concludes that the application does not meet the statutory requirements needed for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the 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 proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and

social costs associated with the development.

This lack of transparency significantly 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 stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and 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 evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding the seascape, landscape, and visual impacts is fundamentally inadequate, failing to accurately capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines near the shore would lead to a continuous and overwhelming industrial presence, significantly altering this distinctive character and resulting in an irreversible transformation of the landscape.

Additionally, the application does not sufficiently reflect the extent of the visual change that would occur. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would directly impact visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to adequately express the level of this impact or its significance within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This leads to the

possibility that the magnitude of visual impact has been understated, thereby questioning the reliability of the assessment.

Moreover, there is a notable deficiency in assessing the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation instead of recognising their interdependence, resulting in a failure to thoroughly evaluate the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are appreciated and disrupting their ties to the natural horizon. This represents a visual impact along with broader cultural and spatial harm that the application has not adequately evaluated.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historical assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a solid worst-case assessment undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of potential environmental impacts linked to construction and pollution is insufficient and lacks the necessary detail for a thorough assessment. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic setting. However, the application fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are set to be developed after consent, which hinders any meaningful appraisal of their potential effectiveness or adequacy.

The reliance on undefined future actions is especially troubling considering the delicate nature of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to contamination and

sediment disruption. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not adequately outline strategies for their prevention, control, or monitoring.

There is also ambiguity concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management approaches, it is impossible to gauge the ecological effects, duration, or extent of these impacts. This uncertainty extends to marine species and habitats deemed sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. The decision to delay contingency planning until after consent is granted obstructs the evaluation of whether suitable protections are in place to handle pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to scrutinise environmental protection measures at the critical point of determination.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be thoroughly assessed before consent is granted, and absent such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies obstruct a rigorous evaluation of construction and pollution risks, further reinforcing the argument that the application remains incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries lacks the necessary depth to evaluate ecological or socio-economic impacts properly. The waters off the West Lewis coast contain a rich marine ecosystem and a vital fishing industry. However, the application does not demonstrate how these important habitats and uses can be protected or preserved without causing significant disruption.

A major concern lies in the assumption that fishing activities can be moved without negative consequences. The application fails to provide any evidence that alternative fishing grounds are viable, accessible, or able to support increased 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. The absence of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable threats to marine species, especially due to the

underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to disturb marine life over extensive areas, particularly affecting species such as dolphins. Concerns arise regarding the anticipated disturbance to a large portion of the local bottlenose dolphin population, but the application minimizes these impacts without adequate supporting evidence.

Moreover, the application acknowledges the necessity of licences to allow harm to European Protected Species, while at the same time claiming that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially where harm is expected to an extent that requires legal permission.

Additionally, the assessment neglects to address the cumulative impacts resulting 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 gauge the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to National Planning Framework 4 or the National Marine Plan. It does not establish that the development can exist alongside current marine users or prevent unacceptable impacts on marine biodiversity, hindering the ability to conclude that the proposal represents sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings inhibit a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant constraints and sensitivities related to onshore infrastructure, which remains materially incomplete. It fails to consider the full extent of impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked; however, they are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Descriptive details reveal that the onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of associated access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, thereby preventing an accurate understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs

a thorough evaluation of cumulative effects. The Environmental Impact Assessment process requires that all elements of a project be considered collectively, yet the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented, thus creating an evidential gap in relation to biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland releases stored carbon, potentially creating a carbon debt that undermines the objectives of renewable energy development. The application fails to adequately address this critical issue or to demonstrate that the overall carbon balance remains beneficial.

Moreover, routing the infrastructure through active croft land introduces the risk of conflicts with existing land use and legal rights. There is no evidence presented that the necessary consents or processes have been initiated, raising serious questions regarding deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over considerable distances, would create a persistent and disruptive "wall of light" effect across the western horizon, drastically changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is especially troubling given the significance of dark skies to the area's identity and the emerging sectors of tourism, such as astro-tourism. The omission represents a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a heightened risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data for the ornithological assessment exacerbates this issue, as it does not capture nocturnal activities or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential hazard remains unassessed. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

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

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

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

SUMMARY

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

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

Furthermore, there are evident procedural shortcomings. The failure to include a

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

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

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

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

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

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

Additional Comments

The energy from these isnt gor the island nor any other UK resource.
Take them elsewhere,pretty simple.

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: 6DA77B66

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and overall design, which may not align with statutory requirements, national policies, or the tenets of sustainable development.

The application is deficient in providing an adequate factual basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal remain unclear. The flexible design framework utilised creates challenges in comprehending potential significant effects, while the dependence on unspecified mitigation strategies means that their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a comprehensive or informed understanding of the environmental, cultural, or community ramifications, with assertions of negligible or non-significant effects lacking robust evidential support.

Substantial policy inconsistencies are evident. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national mandates to safeguard biodiversity, address climate concerns, and maintain environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the capability of the competent authority to ascertain the development's acceptability under policy frameworks.

The proposal's unprecedented scale at this location, with large turbines placed near the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. Together, the lack of comprehensive information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy violations suggest that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report render it materially inadequate, as it fails to offer a full, transparent, or reliable overview of the proposal's likely environmental effects. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty obstructs the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts described may not correspond to the development that is ultimately realised, which in turn hinders both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed subsequently precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a deferral of crucial information to post-consent phases is procedurally unacceptable and conflicts with the core objectives of the Environmental Impact Assessment regime. This regime mandates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

There are also considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects are presented without robust supporting data. The insufficient information prevents an accurate understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that are irreconcilable with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity. It cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of clear mitigation measures, and the existing gaps in baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is

materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies applied are insufficient, as they do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or assess their active usage of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity. This oversight undermines any conclusions suggesting an absence of significant effects on this species.

Further weaknesses are evident in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

The methodological limitations outlined mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty about the true scale of risk posed 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 has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the deficiencies related to incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These issues impede a robust evaluation of the impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, with major gaps in evidence and inconsistencies that undermine its conclusions. The application does not satisfactorily demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are in decline, will not be adversely

affected. This development is sited within critical foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

There is a fundamental contradiction in the application; the developer claims no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only applicable 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. The assessment fails to provide convincing evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. Moreover, the methodologies utilised likely underestimate mortality, particularly given the incomplete baseline data and the insufficient understanding of behavioural responses.

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

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

Additionally, these identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not face adverse effects places the proposal in direct contradiction with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These deficiencies hinder a comprehensive 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 is fundamentally flawed and overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic approach, reducing heritage to a collection of

isolated, unchanging assets, rather than recognising their active social, cultural, and spiritual significance within the community.

One major shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice, yet the assessment classifies them as mere static features, failing to acknowledge their ongoing use, importance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural impacts and neglects their role in community life.

Moreover, the assessment does not take into account intangible cultural heritage, such as the Gaelic language and traditions, nor the longstanding connection between the community and the coastal environment. These elements are vital to the area's identity but are completely disregarded in the assessment, marking a significant oversight. Without addressing these factors, the cultural consequences of the development cannot be accurately comprehended.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristic of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone precludes a lawful determination.

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

Ultimately, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory duties results in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus

groups, the full report has not been made available. This absence of information creates a significant evidential gap that restricts both public understanding and the competent authority's ability to fully assess the social risks identified in the developer's research.

Current summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, gathered through direct engagement, are factual rather than speculative. However, the failure to disclose the complete assessment hinders appropriate scrutiny and limits the assessment of the significance of these impacts within the decision-making framework.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's findings indicating a potential "cultural loss." Despite this, the application does not adequately incorporate these identified impacts or give them appropriate consideration. The withholding of the full Social Impact Assessment obscures the actual human and social costs of the development.

This lack of disclosure significantly compromises the Environmental Impact Assessment process. Understanding the social, economic, and health implications of developments of this magnitude is critical, especially when community character and functioning may be at stake. Without the complete dataset, the application falls short of providing a comprehensive evidential basis needed to weigh the benefits against the harms involved.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for development to promote positive health outcomes and to mitigate any harm. The available evidence points to existing adverse effects that have not been fully revealed, and without the full assessment, it is impossible to show compliance with this policy.

The procedural implications of this situation are noteworthy. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material shortcoming within the application and fails to satisfy the evidential criteria required by the Environmental Impact Assessment framework.

In conclusion, the combination of the non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and untrustworthy. This situation hinders a lawful determination and highlights that the application lacks sufficient supporting information.

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.

CONSTRUCTION AND POLLUTION RISKS

The proposal requires extensive seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The assessment of construction and pollution risks is incomplete, lacking the necessary

detail to evaluate the likely environmental effects. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is especially alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the methods to prevent, control, or monitor these occurrences.

There remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the time of determination.

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

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts contribute to a materially deficient assessment. These shortcomings preclude a thorough 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 vibrant marine ecosystem and an active fishing industry, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposal. A critical concern lies in the assumption that fishing activity can be displaced without consequences, with no evidence provided to support the availability or accessibility of alternative fishing grounds capable of sustaining additional pressure. This lack of information is significant, as it poses risks of overfishing elsewhere and could have wider economic repercussions for the local

fishing fleet. Without a well-supported assessment, the impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal carries considerable risks for marine species, notably due to the underwater noise resulting from construction activities. The extended use of high-energy hammer piling is expected to cause disturbances over large distances, affecting species such as dolphins. The potential impact on a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There exists a clear inconsistency within the application, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies. The dark skies not only contribute to the environmental quality of the area but also play a significant role in its cultural identity and tourism value.

A crucial oversight within the Environmental Impact Assessment is the complete lack of evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the growing importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly significant. Furthermore, the assessment fails to address potential impacts on

nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions.

The application does not include any lighting impact assessment or phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the likelihood of increased mortality. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has been overlooked. The absence of site-specific night-time data creates a critical gap in the understanding of ecological impacts.

In the absence of 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, invoking the precautionary principle and obstructing a lawful determination of the application.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, the lack of consideration for night-time character undermines the broader assessment of landscape and seascape impacts.

Overall, the absence of any assessment concerning dark skies and nocturnal wildlife presents a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

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

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

When considering these points, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information.

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

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: CB5B051A

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. It draws upon a review of the Environmental Impact Assessment Report and the supporting documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and strong cultural heritage. The scale and design of the project, along with its proximity to the shoreline, raise fundamental questions regarding compliance with statutory requirements, national policy, and the principles of sustainable development.

The documentation submitted fails to present a sufficient evidential foundation for lawful consideration. Essential environmental data is absent, while baseline information appears to be both limited and inconsistent. Additionally, critical elements of the proposal remain undefined, and the flexible design framework inhibits a comprehensive understanding of potential significant effects. The dependence on unspecified mitigation measures renders it impossible to assess their effectiveness, leading to a situation where the documentation does not provide a full or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements designed to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the coastline, raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations underscores that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which is a crucial requirement of the Environmental Impact Assessment regime. Instead of delivering a well-structured and reasoned analysis of realistic alternatives based on their environmental effects, it presents a narrative detailing the evolution of the project. This method does not convincingly show that less harmful options have been adequately identified, evaluated, and chosen over more damaging alternatives.

There is a noticeable absence of transparent and evidence-based comparisons regarding alternative offshore locations, varying development scales, or differing design configurations. Specifically, the application fails to indicate that the developer has genuinely considered positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity and the critical role of proximity to shore in determining impact highlight the necessity of such analysis, which is unfortunately missing, preventing any conclusion that the proposed site represents the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to mitigate impacts on sensitive receptors. This includes notable sites of cultural and spiritual significance, such as Barvas Cemetery. The lack of a definitive avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, relying instead on measures aimed at alleviating impacts after the design phase.

Consequently, the application does not satisfactorily show that environmental harm has been reduced through careful site selection, layout, and routing of infrastructure. This oversight signifies a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be affirmed that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application concerning the potential impacts on ornithological interests is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations located on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. The

placement of turbines within key foraging areas and migratory pathways has not been adequately evaluated, particularly regarding the risks of displacement, collision, and habitat loss.

A critical inconsistency arises within the application where the developer asserts that no significant adverse effects will occur while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not supported by the underlying evidence.

The evidence provided does not sufficiently assure that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, especially for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given incomplete baseline data and an inadequate understanding of behavioural responses.

Furthermore, situating turbines within a recognised migratory corridor presents an additional substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term consequences of sustained mortality in this corridor or the potential impacts on species that possess relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, compounded by data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

These deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted places the proposal directly at odds with national policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately address the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline,

characterised by an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes that would arise. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby impacting visual amenity and undermining the defining qualities of naturalness and remoteness. There is a concerning lack of clarity regarding the level of impact and its significance within the context of such a sensitive landscape.

Methodological issues also arise in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, there is a failure to adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact as well as broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks in this proposal is inadequate and lacks the necessary detail for a thorough assessment of potential environmental impacts. The project entails significant seabed preparation and installation activities in a dynamic Atlantic environment, yet it does not present well-developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be prepared after consent is granted, which hampers any meaningful assessment of their viability or effectiveness.

This reliance on unspecified future actions raises serious concerns, particularly considering the sensitivity of the environment at the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on how these risks will be managed, controlled, or monitored.

There remains a degree of uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological repercussions of these impacts. This uncertainty also pertains to possible effects on marine species and habitats previously identified as sensitive in the broader assessment.

Moreover, the lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the proposal restricts the evaluation of whether suitable measures are in place to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection strategies before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Additionally, 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 regarding potential impacts collectively indicate that the assessment is materially deficient. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion 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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. This application revives the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Now, it is being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and could be significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the invocation of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct the ability to arrive at a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the

missing information.

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

Additional Comments

I am concerned for how this could affect wildlife, the beautiful landscape and local economy

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: 8BFCF3D4

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. It draws upon a review of the Environmental Impact Assessment Report and the supporting documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and strong cultural heritage. The scale and design of the project, along with its proximity to the shoreline, raise fundamental questions regarding compliance with statutory requirements, national policy, and the principles of sustainable development.

The documentation submitted fails to present a sufficient evidential foundation for lawful consideration. Essential environmental data is absent, while baseline information appears to be both limited and inconsistent. Additionally, critical elements of the proposal remain undefined, and the flexible design framework inhibits a comprehensive understanding of potential significant effects. The dependence on unspecified mitigation measures renders it impossible to assess their effectiveness, leading to a situation where the documentation does not provide a full or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements designed to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the coastline, raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations underscores that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, which is a crucial requirement of the Environmental Impact Assessment regime. Instead of delivering a well-structured and reasoned analysis of realistic alternatives based on their environmental effects, it presents a narrative detailing the evolution of the project. This method does not convincingly show that less harmful options have been adequately identified, evaluated, and chosen over more damaging alternatives.

There is a noticeable absence of transparent and evidence-based comparisons regarding alternative offshore locations, varying development scales, or differing design configurations. Specifically, the application fails to indicate that the developer has genuinely considered positioning turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity and the critical role of proximity to shore in determining impact highlight the necessity of such analysis, which is unfortunately missing, preventing any conclusion that the proposed site represents the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to mitigate impacts on sensitive receptors. This includes notable sites of cultural and spiritual significance, such as Barvas Cemetery. The lack of a definitive avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, relying instead on measures aimed at alleviating impacts after the design phase.

Consequently, the application does not satisfactorily show that environmental harm has been reduced through careful site selection, layout, and routing of infrastructure. This oversight signifies a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be affirmed that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application concerning the potential impacts on ornithological interests is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations located on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. The

placement of turbines within key foraging areas and migratory pathways has not been adequately evaluated, particularly regarding the risks of displacement, collision, and habitat loss.

A critical inconsistency arises within the application where the developer asserts that no significant adverse effects will occur while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not supported by the underlying evidence.

The evidence provided does not sufficiently assure that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, especially for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given incomplete baseline data and an inadequate understanding of behavioural responses.

Furthermore, situating turbines within a recognised migratory corridor presents an additional substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term consequences of sustained mortality in this corridor or the potential impacts on species that possess relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, compounded by data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

These deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted places the proposal directly at odds with national policy.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately address the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline,

characterised by an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes that would arise. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby impacting visual amenity and undermining the defining qualities of naturalness and remoteness. There is a concerning lack of clarity regarding the level of impact and its significance within the context of such a sensitive landscape.

Methodological issues also arise in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, there is a failure to adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact as well as broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks in this proposal is inadequate and lacks the necessary detail for a thorough assessment of potential environmental impacts. The project entails significant seabed preparation and installation activities in a dynamic Atlantic environment, yet it does not present well-developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be prepared after consent is granted, which hampers any meaningful assessment of their viability or effectiveness.

This reliance on unspecified future actions raises serious concerns, particularly considering the sensitivity of the environment at the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on how these risks will be managed, controlled, or monitored.

There remains a degree of uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological repercussions of these impacts. This uncertainty also pertains to possible effects on marine species and habitats previously identified as sensitive in the broader assessment.

Moreover, the lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the proposal restricts the evaluation of whether suitable measures are in place to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection strategies before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Additionally, 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 regarding potential impacts collectively indicate that the assessment is materially deficient. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion 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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal embodies a significant failure to meet the standards of sustainable development as defined by statutory duties, national policy, and evidential criteria. This application revives the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Now, it is being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are serious shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and overlooks crucial impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The proposal also demonstrates clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty as outlined in the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a significant gap. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and could be significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the invocation of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The multitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstruct the ability to arrive at a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to mandate the submission of the

missing information.

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

Additional Comments

I am concerned for how this could affect wildlife, the beautiful landscape and local economy

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: 8BFCF3D4

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. The proposal has been reviewed in light of the Environmental Impact Assessment Report and associated documents, revealing several material deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. Concerns regarding compatibility with statutory requirements and national policy arise from the scale, proximity, and design of the project, challenging the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework used obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, while claims of negligible or non-significant effects lack robust evidence.

There are notable policy conflicts present. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts relate directly to the statutory tests necessary for consent and hinder the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal in this area, featuring large turbines placed near 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 light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and dependable account of the probable environmental consequences of the proposed project. The report's reliance on a flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This lack of clarity hampers the ability to consistently apply a worst-case scenario, undermining the assessment's integrity and resulting in the potential for the impacts described not to align with the development ultimately executed. This deficiency hampers both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Moreover, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans, which remain undeveloped at this stage. Seeking consent under these conditions means that environmental harm will ostensibly be addressed later, thereby obstructing any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally improper, contravening the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly defined prior to determination.

Additionally, significant evidential gaps are present, including inadequacies in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty incompatible with statutory obligations.

Consequently, the application does not satisfy the evidential threshold stipulated by the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development on the West Lewis coastline lacks a thorough assessment of cultural heritage and community identity, failing to recognise the area as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The approach taken in the application reduces heritage to mere static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant oversight is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice, yet they are categorised as static features in the assessment, which disregards their continued use, significance, and the impact of

development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously missing from the analysis, marking a considerable omission. This lack of consideration hinders a comprehensive understanding of the cultural impact of the development.

There are also critical concerns related to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no implementation of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the credibility of the assessment and does not adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A major procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to prevent a lawful determination.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear violation of policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory requirements results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment presents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer's own research. This lack of transparency is particularly concerning given that the assessment was commissioned by the developer and included focus groups with local residents. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, are substantive and should not be dismissed as speculative. The omission of the full assessment limits scrutiny of the findings and their significance in the decision-making process.

Moreover, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer’s findings. However, these crucial impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should foster positive health outcomes and mitigate harm, the existing evidence points to adverse effects that remain undisclosed. Thus, without the full assessment, compliance with the requisite policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and unreliable, preventing a lawful determination and affirming that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is severely lacking and does not truly capture the extent of change nor the sensitivity of the environment in question. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Furthermore, the application fails to accurately depict the magnitude of the visual change. Due to their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts in relation to such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises the possibility that the true extent of the visual impact has been minimised, thus compromising the reliability of the assessment.

Moreover, there is a critical failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This goes beyond a mere visual impact; it represents a broader cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, this proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The degree of change proposed is incompatible with the need to protect landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

Additionally, it is apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of potential construction and pollution risks is insufficient and lacks the necessary detail to evaluate environmental effects adequately. The proposal entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, thus hindering any meaningful assessment of their adequacy.

or effectiveness.

This dependence on undefined future measures raises significant concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application fails to allow for the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated before consent, and the absence of this information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning inadequacy in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate that these vital uses and habitats can be preserved without significant disruption.

One of the major concerns is the flawed assumption that fishing activity can be displaced without repercussions. The absence of evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle increased pressure is notable. This gap is critical, as such displacement could lead to overfishing in other

areas and have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it remains impossible to accurately gauge the impacts on fisheries and the livelihoods that depend on them.

Furthermore, 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 an extended duration is expected to disturb a wide area, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious red flags, yet the application downplays these concerns without adequate supporting evidence.

There is a glaring inconsistency in the application where the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously, the impacts are described as negligible. This contradiction casts doubt on the credibility of the assessment and raises serious compliance issues with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Lacking 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 substantiate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal can be considered sustainable development.

Overall, the deficiencies in demonstrating evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application result in an incomplete and unreliable assessment. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a complete assessment of the onshore infrastructure, failing to consider the full range of impacts from this integrated project. It treats the offshore turbines and onshore works as separate entities, leading to a fragmented evaluation that obscures the overall environmental and socio-economic effects.

Key onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts prevents a clear understanding of the project's environmental footprint.

By excluding or delaying the evaluation of onshore impacts, the application hinders the proper assessment of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are examined together, yet the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks also exist for sensitive habitats such as machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been implemented, highlighting a clear gap in evidence regarding biodiversity protection.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence that necessary consents or processes have been initiated, raising concerns about the project's deliverability and lawful implementation.

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

In summary, the division of project components, the lack of a comprehensive assessment, and insufficient evidence on environmental and land use impacts make this section of the application incomplete and unreliable, ultimately preventing a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant shortfall in meeting the standards of sustainable development when evaluated against statutory obligations, national policy, and required evidence. This application reiterates the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable level of industrialisation. Now, it is introduced under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and the wellbeing of communities.

There are critical deficiencies in the evidential foundation provided for the determination of the application. Key baseline data is missing, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, the application neglects crucial impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

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

Impact Assessment breaches the statutory requirements set forth by the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment represents a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage. There is insufficient evidence to confirm that impacts on health and wellbeing are acceptable, nor can it substantiate a net economic benefit, largely due to the absence of tourism impact analysis. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The required evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

This proposal would bring about 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 connections, and the potential repercussions for tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental concerns, inhibit a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to require the submission of the outstanding information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B1DC2832

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, raising significant concerns regarding landscape capacity, visual dominance, and environmental impact. Furthermore, critical environmental data is missing, and baseline information is limited and inconsistent. Key aspects of the proposal remain undefined, and the reliance on a flexible design framework prevents a clear understanding of likely significant effects. The absence of sufficient information, reliance on undefined mitigation measures, and evidential weaknesses demonstrate that the application is incomplete and incapable of supporting a lawful determination.

There are clear and substantive policy conflicts as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met, undermining the ability of the competent authority to conclude that the development is acceptable in policy terms.

In addition, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence, and the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development is fundamentally questionable. In these circumstances, the precautionary principle must apply, as the application does not provide an adequate evidential basis for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity related to the proposed development is insufficient and fails to acknowledge the West Lewis coastline as a dynamic cultural landscape, where environment, language, tradition, and community are interconnected. The application adopts a simplified viewpoint, regarding heritage as merely a collection of isolated, unchanging assets, rather than recognising their active social, cultural, and spiritual significance within the community.

A significant oversight is evident in the assessment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites remain active locations for burial and spiritual activities, yet the assessment classifies them as static elements,

neglecting their ongoing utilisation, significance, and the potential effects of development on their surroundings. This erroneous classification leads to an inadequate appraisal of cultural impacts, omitting their relevance to community life.

Moreover, the assessment fails to encompass intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are fundamental to the identity of the region but have been entirely overlooked in the assessment, constituting a substantial omission. The absence of consideration for these elements hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population possesses a unique cultural identity that is recognised as characteristic of an Indigenous People. However, no process of Free, Prior and Informed Consent has been conducted. This lack of meaningful engagement calls into question the validity of the assessment and does not align with established participatory principles in decisions that affect cultural and environmental matters.

A notable procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is required under 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 repercussions on the island community. This singular omission is sufficient to obstruct a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and sites. The failure to address both tangible and intangible heritage, along with the disregard for ongoing cultural practices, represents a clear violation of policy standards.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory duties culminates in a considerable evidential void. The cultural impacts of the development have not been adequately analysed, and the application does not furnish a reliable foundation for determining the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline boasts an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline threatens to establish a continuous and dominant industrial presence, fundamentally transforming this unique landscape. This change would be permanent and irreversible, detracting from the area's inherent qualities.

The visual impact assessment falls short in representing the magnitude of change that these turbines would impose. Their scale and location would dominate views from residential areas, historic sites, and popular coastal locations, negatively affecting

visual amenity and compromising the naturalness and sense of remoteness that define the region. The assessment does not adequately convey the significance of these impacts, particularly given the sensitivity of the landscape.

Concerns also arise regarding the methodologies used to select and present visual viewpoints. Evidence indicates that the viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, calling into question the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, disregarding their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt the relationships between these heritage assets and their natural surroundings, altering how they are experienced and severing their connection to the horizon. This represents not only a visual impact but also broader cultural and spatial harm that has not been adequately assessed within the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, which mandates the protection of natural places and historic assets. The scale of the proposed changes conflicts with requirements to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertion of compliance with relevant policies.

The impacts identified in the application cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. This change is not merely a matter of degree; it is fundamental and permanent, incapable of being diminished to an acceptable level through mitigation efforts.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, which raises serious concerns about the potential impacts on the local ecosystem and economy. The waters off the West Lewis coast host a rich marine ecosystem and a vital fishing industry; however, the proposal fails to demonstrate how

these crucial habitats and activities can be preserved without causing substantial disruption.

One major concern is the flawed assumption that fishing operations can be displaced without adverse effects. There is a lack of evidence supporting the availability or accessibility of alternative fishing grounds that could sustain the additional pressure resulting from displacement. This gap is critical, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the true impacts on fisheries and community livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended timeframe is expected to disturb marine life over large distances, notably impacting populations such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; nevertheless, the application downplays the seriousness of these effects without adequate justification.

The assessment also exhibits contradictions, particularly in acknowledging the need for licenses to harm European Protected Species while simultaneously characterising impacts as negligible. This inconsistency undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, especially given that harm is anticipated to a level that would require legal authorisation.

Furthermore, there is a failure to account for cumulative impacts resulting from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic context.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, thereby failing to confirm that the proposal constitutes sustainable development.

Overall, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment indicate that it is incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, especially when evaluated against statutory duties, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of

industrialisation was deemed unacceptable. Presenting the project now under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

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

Procedurally, there are evident failings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a significant omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

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

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

Additional Comments

Please don't spoil the Outer Hebrides. It is one of the most beautiful areas in the world with natural beauty. People travel from all over the world to see this area, which sadly would be ruined by this just offshore. I don't object to wind turbines but should be far enough out to not impact on the views from the shores.

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: 1087898E

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 submitted under relevant marine licensing and Environmental Impact Assessment regimes. The application raises significant concerns related to planning, environmental, cultural, and procedural matters, as identified in a review of the Environmental Impact Assessment Report and associated documents. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a solid evidential basis necessary for a lawful determination. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework used hinders a clear understanding of potential significant effects, and the unsubstantiated reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and significant. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency pertains particularly to biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements regarding the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests required for consent and weaken the capacity of the competent authority to determine that the development aligns with policy requirements.

The unprecedented scale of the proposal raises further concerns, with large turbines located close to the shoreline. This positioning creates significant issues relating to landscape capacity, visual dominance, and environmental impact. Overall, the combination of insufficient information, undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and does not support a lawful determination. In light of these factors, the precautionary principle should apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking and does not give a complete, clear, or trustworthy overview of the potential environmental effects of the proposal. The flexible Project Design Envelope used does not commit to specific turbine dimensions, layouts, or configurations. This creates significant uncertainty and hinders

the ability to consistently apply a worst-case scenario. As a result, the assessment's integrity is compromised, meaning that the impacts described may not accurately reflect the final development. This prevents both the public and the competent authority from fully understanding the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that have not been defined yet. Seeking consent under these conditions means that any environmental harm will supposedly be addressed later, which undermines a proper evaluation of effectiveness and assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime. This regime requires that significant effects and mitigation measures are clearly identified before a decision is made.

There are also major evidential gaps, including insufficient baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information means that cumulative and worst-case impacts are not clearly understood, resulting in scientific uncertainty that does not meet 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 raises concerns regarding the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not show compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity. It has not been demonstrated that the impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough evaluation of environmental effects, meaning the competent authority cannot make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is deeply flawed. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. This deficiency undermines any valid evaluation of potential impacts.

Particularly concerning is the omission of otters, a European Protected Species, which have not been properly recognised or assessed for their active use of the coastal areas for foraging and movement. The lack of consideration of their core foraging range and

behaviour raises significant concerns about the potential effects of construction disturbances, noise, and increased activity. Consequently, this oversight compromises the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is inadequately addressed, relying on aerial surveys that introduce considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. This failure to incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that the findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites,

such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

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 transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, which raises serious concerns about the validity of the evaluation process. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the absence of the complete report creates a substantial evidential gap. This lack of disclosure hinders both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Residents are reportedly enduring measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as derived from direct engagement rather than speculation. However, without the full assessment being made public, it becomes difficult to scrutinise these findings effectively and assess their significance in the context of the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the potential for “cultural loss” noted in the developer’s findings. Despite these serious implications, they have not been adequately integrated into the primary application or given the necessary weight in consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency has broader implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may alter community character and functioning. By withholding the full dataset, the application does not furnish a complete evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and avoid inflicting harm, yet the evidence that is available points to existing adverse effects that have not been fully revealed. In the absence of the full assessment, it is impossible to demonstrate compliance with this policy.

Procedurally, these concerns are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and fails to meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation impedes a lawful determination and underscores the conclusion that the application lacks sufficient information to warrant support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, failing to adequately capture the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would create an overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

Moreover, the application does not sufficiently address the extent of the visual change. The size and closeness of the turbines would dominate views from nearby residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment

inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The scale of transformation is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal exhibits significant deficiencies regarding the assessment of construction and pollution risks, which ultimately hampers a thorough evaluation of potential environmental effects. This application involves considerable seabed preparation and installation in a challenging Atlantic environment. However, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans.

Instead, it relies on mitigation and contingency measures that are to be developed after consent has been granted, thereby obstructing any meaningful appraisal of their adequacy or effectiveness.

The application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, yet it fails to furnish adequate details on how these risks will be prevented, controlled, or monitored. This lack of clarity is especially alarming in light of the sensitive nature of the receiving environment, particularly the West Lewis coastline, which is home to clean coastal waters and significant habitats vulnerable to sediment disturbance and contamination.

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

The absence of specific emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application effectively inhibits an evaluation of whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and compromises the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the Environmental Impact Assessment regime requirements. Prior to consent, it is necessary to assess likely significant effects and related mitigations, and a lawful determination cannot be achieved in the absence of such information. Additionally, the application does not demonstrate compliance with policy obligations concerning environmental protection and water quality.

In summary, the incomplete assessment arising from the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts renders the overall evaluation of construction and pollution risks materially deficient. These failings underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The inadequacy of the assessment regarding fisheries and marine life raises serious concerns about the potential ecological and socio-economic impacts of the proposal. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A critical issue is the unfounded assumption that fishing activities can be displaced without any repercussions. The lack of evidence to show that there are alternative

fishing grounds that are accessible and capable of supporting the added pressure is particularly alarming. This gap in information is crucial, as the risk of overfishing in other areas poses potential economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, it becomes impossible to understand the true impacts on fisheries and the livelihoods they support.

The proposal also poses significant risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to cause widespread disturbance, affecting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population raises substantial concerns, yet the application tends to minimise the significance of these effects, lacking sufficient supporting evidence.

Moreover, there is a troubling inconsistency within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and brings into question its compliance with the Habitats Regulations, particularly where harm is expected to the extent that legal authorisation is required.

The assessment does not adequately account for cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains uncertain.

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

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

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 absence of any assessment regarding dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, visible over considerable distances, would create an ongoing and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This failure is particularly important considering the significance of dark skies to the area's identity and the development of emerging tourism sectors, such as astro-tourism. This gap in assessing landscape and environmental impacts is concerning.

Equally alarming is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and a heightened risk of collision. The absence of a lighting impact assessment or a phototaxis study in the application means there is no evaluation of how the aviation lighting may impact these species or contribute to increased mortality.

This shortfall is exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and its associated risks. For example, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this potential risk remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4, particularly concerning the safeguarding of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall setting.

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

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it lacks a quantified evaluation of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. In spite of this growth, the application does not consider how the proposed industrialisation of the seascape and the associated decline in

environmental quality would affect Tourism Gross Value Added or broader economic resilience. In the absence of such analysis, it is impossible to ascertain whether the proposed development would result in a net economic benefit or jeopardise an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in promoting tourism. It overlooks the significance of unspoiled landscapes and dark skies in shaping visitor experiences, particularly in relation to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognised and expanding segment of the local economy.

In an island community with limited economic diversification, the omission of tourism impact assessments carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity of demonstrating net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental factors driving visitor behaviours, and acknowledge the island's economic dependencies culminates in a substantial evidential deficiency. This gap hampers a thorough evaluation of the economic consequences, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards required for sustainable development, particularly when evaluated against statutory responsibilities, national policy, and evidential requirements. It echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community welfare, the application falls short.

Critical deficiencies plague the evidential basis for the proposal, revealing gaps in baseline data and the continued utilisation of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of potential significant effects

or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission. Such 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 direct contradiction to National Planning Framework 4, the proposal does not adequately demonstrate protection of biodiversity, natural habitats, and cultural heritage. It fails to verify that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative impacts associated with both offshore and onshore elements have not been thoroughly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is poised to bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and the impacts on tourism represent enduring effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority must either reject consent on these grounds or invoke the necessary regulatory provisions to compel the submission of the outstanding 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 wrote the book - The Hebrides - A Geography of Time about how these islands are endlessly the plaything of developers and entrepreneurs- there is always a big thing that will save the islands. My father is from Lewis and my mother from Skye - it can be a struggle to make a life and a living on these islands but we at least expect local councils to show integrity- the fact that we are having to oppose the massive intrusive industrialisation of our islands shows the ineptitude of local and national governments

and the greed of distant developers. This is a crazy brutal proposal forcing the community onto the back foot and creating worry and panic - developers and govt should be ashamed. The Highlands and Islands are already a 3-4 times net generator of green electricity to the rest of Scotland and the Uk yet the community has the highest fuel poverty in the Uk - electrical heat is 4.3 times the cost of gas. Focus on fixing the rural and island disadvantage by striving for equity rather than by industrialisation of the sea and coasts. So much for island proofing - this is a brutal rude planning proposal and one must question the intention and motivation of councillors - community owned small scale solutions are entirely appropriate but this is just another super quarry. A full strategic review of renewable energy is required and one focussed on delivering green renewable heat and energy to all residents on tariffs at least the same as mains gas.

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: FFB38C65

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and the supporting documentation has identified significant deficiencies in terms of material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, in an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a noticeable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined. The employment of a flexible design framework hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims made regarding negligible or non-significant effects are not substantiated by robust evidence.

The proposal also presents clear and substantive conflicts with existing policy frameworks. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity are being met. These policy conflicts are directly relevant to the statutory tests required for consent and significantly undermine the ability of the competent authority to determine that the development is policy-compliant.

The scale of the proposed wind farm is unprecedented for this location, with large turbines proposed to be installed in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and evident non-compliance with policy indicate that the application is incomplete and fails to support a lawful determination. Given these circumstances, the precautionary principle should be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The ecological assessment provided lacks the necessary completeness and reliability to understand the ecological receptors in the West Lewis coastal environment. This region is a biologically active marine system, yet the methodologies used have not sufficiently captured the presence, behaviour, and habitat use of marine species. Consequently, the assessment fails to deliver an evidential basis for evaluating potential impacts.

Significant shortcomings are evident in the treatment of otters, a European Protected Species. The assessment does not adequately acknowledge their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts from construction activities, noise, and increased human presence are not thoroughly evaluated. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Similar deficiencies are noted in the assessment of basking sharks. The reliance on aerial surveys leads to a substantial detection bias, particularly given the conditions in the Atlantic. This methodology likely underrepresents their presence, especially when contrasted with land-based observations that indicate these waters are used frequently by the species. The failure to integrate or appropriately consider such information contributes to an incomplete baseline and diminishes the credibility of the findings.

These methodological weaknesses result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the requirements established under the Environmental Impact Assessment regime and the National Planning Framework 4, as the necessary identification and assessment of protected species have not been conducted appropriately. The uncertainty generated prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and highlight the overall lack of a sufficient evidential foundation for the application.

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 application does not sufficiently demonstrate that these species will not be adversely affected, particularly as it is situated within key foraging areas and migratory pathways. The ornithological assessment, however, is fundamentally flawed, presenting significant gaps in evidence

and internal inconsistencies that undermine its conclusions. It fails to robustly evaluate the implications of displacement, collision risk, or habitat loss.

There exists a critical contradiction within the application, where the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the available evidence.

The assessment lacks sufficient proof that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully considered, and reliance on modelling approaches introduces uncertainty, especially for declining species such as Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling constraints, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, thus preventing a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the planning application inadequately addresses the cultural heritage and identity of the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application treats heritage as a collection of static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is seen in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are places of active burial and spiritual practice, yet the assessment reduces them to static features, ignoring their continued use and significance. This mischaracterisation leads to an incomplete evaluation of cultural impacts and neglects their importance in community life.

Moreover, the application does not assess intangible cultural heritage, which includes the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity, but they are missing from the assessment, which is a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the development.

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

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

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not adequately support an assessment of the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding 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, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

It is evident that the impacts identified are not likely to be mitigated effectively. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application presents a significant inadequacy in its assessment of fisheries and marine life, failing to adequately evaluate the ecological and socio-economic impacts

involved. The waters off the West Lewis coast are home to both a rich marine ecosystem and a thriving fishing industry, yet the proposal does not provide assurance that these vital uses and habitats can be preserved without causing considerable disruption.

A central concern is the assumption made within the application that fishing activities can be relocated without consequences. It lacks any evidence indicating that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures from displaced fishermen. This significant oversight poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a transparent and evidence-backed assessment, the potential effects on fisheries and the livelihoods they support remain unclear.

Additionally, the proposal poses serious risks to marine species, notably through the underwater noise generated during construction. The high-energy hammer piling, projected to occur over an extended duration, is likely to create disturbances over considerable distances, thereby impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet the application diminishes the importance of these effects without adequate substantiation.

There exists a notable contradiction within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This inconsistency undermines the assessment's credibility and raises significant concerns about adherence to the Habitats Regulations, especially in instances where harm is expected to an extent requiring legal approval.

Moreover, the assessment does not adequately address the cumulative impacts from multiple stressors, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, the overall repercussions on marine ecosystems and socio-economic conditions remain undetermined.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. 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 Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency 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 represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential benchmarks. This application revisits the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current proposal emerges under a more robust policy framework that places increased emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

A thorough and reliable evidential basis for the determination of this application is not provided. There exist critical gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, there is a significant omission of crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects and residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment further represents a material omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Additionally, 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, disruptions to cultural and visual relationships, and the impacts on tourism signify permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

The proposed wind farm on the Isle of Lewis would scar one of Scotland's most beautiful and unspoilt landscapes, not just with the turbines themselves but with access roads, and infrastructure visible for miles across the island. This dramatic change would damage the wild character and sense of peace that make Lewis unique. This would not just negatively impact the inhabitants but would also likely cause a decrease in visitors to the island and therefore threaten the tourism economy which Isle of Lewis benefits greatly from.

The development also threatens sensitive habitats and vulnerable wildlife, including breeding birds and peatland ecosystems that have existed undisturbed for generations. Once this landscape is industrialised, the damage to the natural environment and local wildlife cannot easily be reversed.

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: A618B950

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and the supporting documentation has identified significant deficiencies in terms of material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, in an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the project raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a noticeable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined. The employment of a flexible design framework hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims made regarding negligible or non-significant effects are not substantiated by robust evidence.

The proposal also presents clear and substantive conflicts with existing policy frameworks. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity are being met. These policy conflicts are directly relevant to the statutory tests required for consent and significantly undermine the ability of the competent authority to determine that the development is policy-compliant.

The scale of the proposed wind farm is unprecedented for this location, with large turbines proposed to be installed in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and evident non-compliance with policy indicate that the application is incomplete and fails to support a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the presence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is significantly lacking and does not fulfil the statutory requirements outlined in the Environmental Impact Assessment regime. The

application fails to provide a structured and reasoned comparison of viable alternatives based on their environmental effects, instead offering a narrative account of the project's evolution. This method does not demonstrate that less harmful options have been thoroughly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such analysis prevents any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly investigated to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been effectively employed, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be determined that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, failing to provide a complete and reliable understanding of ecological receptors in this sensitive marine area. The methodologies employed do not effectively capture crucial aspects such as species presence, behaviour, and habitat use, leading to an incomplete baseline dataset. This deficiency undermines the foundation necessary for evaluating potential impacts.

A notable oversight is the assessment of otters, which are classified as a European Protected Species. The application neglects to properly acknowledge their active use of coastal regions for foraging and movement. Consequently, the assessment lacks

consideration of their core foraging range and behavioural patterns, leaving the potential impacts of construction disturbance, noise, and increased human activity unassessed. This failure to evaluate these factors calls into question any conclusions drawn regarding the absence of significant effects on otters.

The evaluation of basking sharks also presents significant deficiencies, as the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks, especially when compared to established land-based observations that demonstrate their frequent utilisation of these waters. The lack of incorporation of such data contributes to an incomplete baseline, further undermining the reliability of the conclusions presented.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. Additionally, the insufficiency of baseline data hampers the ability to assess cumulative and indirect impacts effectively, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks posed to marine species and their habitats.

Regulatory compliance issues arise as the application does not satisfy the requirements established by the Environmental Impact Assessment framework and the National Planning Framework 4, since protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, activating the precautionary principle. Therefore, consent for the proposed application cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These critical deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by gaps in evidence and inconsistencies that call its conclusions into question. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development area, yet the assessment fails to rigorously evaluate issues such as displacement, collision risk, or habitat loss.

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the

conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional and substantial risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of sustained mortality in this corridor or the potential impacts on species with comparatively small global populations.

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These inadequacies obstruct a thorough evaluation of potential impacts and contribute to the overall assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious oversight. Without these considerations, the true cultural impact of the development remains unexamined.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with this application is significantly lacking in transparency and is therefore not compliant with legal requirements. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local residents, the complete report has not been made available to the public. This absence creates a considerable evidential gap, limiting both public understanding and the capacity of the competent authority to fully assess the social risks highlighted in the developer's own research.

Summaries that are available reveal that local residents are already experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct community engagement and should be taken seriously rather than dismissed as speculation. However, the lack of access to the comprehensive assessment hampers proper scrutiny of these findings and obstructs a thorough evaluation of their importance in the decision-making process.

Moreover, there is documented evidence suggesting that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" explicitly mentioned in the developer's own findings. These adverse impacts have not been adequately considered in the main application, nor have they been given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the actual social and human costs of the proposed development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health repercussions is essential for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a full evidential basis to evaluate the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate any harm; however, the evidence available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, there can be no demonstration of compliance with this policy.

The implications of these procedural shortcomings are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with existing evidence of adverse effects, leads to an incomplete and unreliable evaluation. This situation precludes a lawful determination and further reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly inadequate, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not adequately illustrate the extent of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the qualities of naturalness and remoteness. The

assessment fails to effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. There is evidence to suggest that these viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, casting doubt on the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the surrounding landscape and the Atlantic horizon. The evaluation treats these sites as isolated entities, overlooking their interdependence and resulting in an incomplete assessment of their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and disconnecting them from their natural context. This not only presents a visual impact but also signifies broader cultural and spatial harm, which has not been adequately addressed in the application.

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

The identified impacts are inherently unmitigable. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change to the landscape is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks. It lacks the necessary detail to effectively evaluate potential environmental impacts, particularly given that the West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. This sensitive environment necessitates well-defined Construction Environmental Management Plans and Pollution Prevention Plans, which are currently absent. Instead, the application relies on vague mitigation and

contingency measures that are to be developed after consent is granted, obstructing any meaningful assessment of their potential effectiveness.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from the proposed seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to ascertain the extent and duration of these impacts, or their ecological ramifications. This uncertainty extends to sensitive marine species and habitats that have already been identified in broader assessments.

Additionally, the absence of detailed emergency response procedures compounds these issues. The deferral of essential contingency planning until after consent is granted hinders a proper evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and potential mitigation are assessed prior to consent; if this crucial information is absent, a lawful determination cannot be achieved. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, the lack of comprehensive management plans, and the uncertainty surrounding potential impacts render the assessment materially insufficient. These flaws prevent a thorough evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application lacks comprehensiveness, resulting in an inadequate analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show that these essential habitats and activities can be preserved or sustained without substantial disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is a notable absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating any additional pressure. This gap is critical, as displacement could lead to overfishing in other areas, potentially resulting in severe economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it becomes impossible to fully grasp the implications for fisheries and local livelihoods.

Moreover, the proposed development presents considerable threats to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive distances, adversely affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application diminishes the seriousness of these effects, lacking adequate evidence to support such claims.

There is also an evident contradiction in the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that these impacts are negligible. This inconsistency undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm is at a level necessitating legal approval.

Additionally, the assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these interconnected effects is essential for determining the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short in demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding its sustainability.

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic effects, and internal inconsistencies collectively render the assessment incomplete and untrustworthy. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Moreover, the application's exclusion or deferral of onshore impacts hampers the

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change fundamentally alters the night-time environment and poses a serious concern, as the West Lewis coastline is known for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment, representing a material omission.

There is no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly significant considering the importance of dark skies to the area's identity and the growth of sectors such as astro-tourism. As a result, there is a clear gap in the overall landscape and environmental assessment that cannot be overlooked.

Furthermore, the assessment does not address the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel

are sensitive to artificial lighting due to phototaxis, leading to disorientation and an increased risk of collision. The application fails to include a lighting impact assessment or a phototaxis study, neglecting to evaluate how the proposed aviation lighting might affect these species or contribute to increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

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

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

SUMMARY

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

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

Procedural inadequacies further undermine the application. The failure to produce a compliant Island Communities Impact Assessment contravenes statutory obligations

under the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

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

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

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

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

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: 48655DB2

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

Dear Sir/Madam

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

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces 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 indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

ASSESSMENT OF ALTERNATIVES

The application does not satisfy the statutory requirements of the Environmental Impact Assessment regime, particularly with regard to the assessment of alternatives. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a significant lack of transparent and evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has considered the potential of locating turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental impact, the failure to conduct such analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

Further deficiencies are evident in the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that there has been no application of mitigation by design, which has led to a reliance on post-design mitigation 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 and prevents the competent authority from determining whether there are less harmful and more suitable alternatives available. Without a comprehensive alternatives assessment, it cannot be asserted that the proposal constitutes a sustainable or policy-compliant solution.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application has significant shortcomings regarding the assessment of community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of

participation in decisions that affect cultural and environmental interests.

Moreover, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These sites are active places for burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation fails to acknowledge their ongoing use and meaning, as well as the potential impact of development on their setting. Consequently, this results in an inadequate evaluation of cultural effects and neglects their importance in community life.

The assessment of cultural heritage and community identity is fundamentally lacking and fails to recognise the West Lewis coastline as a living cultural landscape. It overlooks the intrinsic connections between environment, language, tradition, and community. By adopting a reductive approach, the application treats heritage as a series of isolated, static assets, ignoring their social, cultural, and spiritual functions within the community.

Additionally, the application neglects to assess intangible cultural heritage, such as 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 absent from the assessment, representing a significant omission. Without considering these factors, the true cultural impact of the development remains unexamined.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This absence alone is sufficient to impede a lawful determination.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices clearly diverges from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency and detail in its assessment of social impacts, health, and wellbeing, rendering it materially deficient and unlawful. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the full report remains unpublished. This results in a significant evidential gap, hindering both public understanding and the ability of the

competent authority to grasp the full extent of social risks identified through the developer's own research.

Summaries available indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, thereby eliminating speculation. Nevertheless, the failure to disclose the complete assessment limits proper scrutiny of the findings and obstructs a meaningful evaluation of their significance in the decision-making process.

Furthermore, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings identifying "cultural loss." Despite this recognition, such impacts have not been adequately integrated into the main application or given appropriate weight. The lack of access to the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process, which requires a comprehensive understanding of social, economic, and health impacts, especially for developments of this magnitude that may affect community character and functioning. By withholding the complete dataset, the application fails to provide a robust evidential basis needed to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and to mitigate harm; however, the evidence suggests existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

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

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

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 landscape, seascape, 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a critical shortfall in fulfilling the principles of sustainable development as mandated by statutory duties and national policy. This application echoes the fundamental issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, it is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

The evidential basis provided in the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope persists. There is an overreliance on unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are overlooked. Consequently, the Environmental Impact Assessment remains unfinished, hindering a comprehensive understanding of significant effects and residual impacts.

Moreover, clear procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while failing to disclose a full Social Impact Assessment constitutes a serious omission. These failings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct contradiction to National Planning Framework 4, as it does not demonstrate the necessary protection for biodiversity, natural spaces, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

Furthermore, 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 relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In conclusion, the application is procedurally and substantively unsuitable for determination. The multitude of information gaps, in conjunction with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or activate the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

I strongly object the proposed offshore windfarm mainly due to the lack of consultation with local residents and lack of benefits to the wider community.

We have the highest rate of fuel poverty in the British Isles yet we are not benefiting adequately from the proposed new energy scheme.

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: 118B6CC6

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

The application lacks an adequate evidential basis necessary for lawful determination. There are notable gaps in critical environmental data, with baseline information appearing limited and inconsistent, while key elements of the proposal remain unspecified. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the available documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering unsupported the claims of negligible or non-significant effects.

Additionally, there are substantial conflicts with established policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines situated near the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and not capable of supporting a lawful determination. In light of these factors, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report render it materially inadequate, as it fails to offer a full, transparent, or reliable overview of the proposal's likely environmental effects. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty obstructs the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts described may not correspond to the development that is ultimately realised, which in turn hinders both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed subsequently precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a deferral of crucial information to post-consent phases is procedurally unacceptable and conflicts with the core objectives of the Environmental Impact Assessment regime. This regime mandates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

There are also considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects are presented without robust supporting data. The insufficient information prevents an accurate understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that are irreconcilable with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity. It cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of clear mitigation measures, and the existing gaps in baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a full and dependable understanding of ecological receptors in the West Lewis

coastal environment. This area is a biologically active marine system, yet the baseline data is incomplete. The methodologies used do not sufficiently capture species presence, behaviour, and habitat use, leading to a lack of sound evidence for evaluating impacts.

One significant gap involves otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Consequently, the assessment does not consider their core foraging range or behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated, undermining claims regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks shows further deficiencies. The reliance on aerial surveys creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly compared to established land-based observations that indicate these waters are frequently used. Not incorporating or properly considering such data contributes to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This uncertainty casts doubt on the actual risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been correctly identified or assessed. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall finding that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, characterised by internal inconsistencies and gaps in evidence that undermine its findings. The application does not sufficiently demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected by the proposed development. Key foraging areas and migratory pathways are situated within the development site, yet there is inadequate evaluation of the potential implications related to displacement, collision risk, or

habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects, while also proposing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment and suggests that the conclusions drawn lack support from reliable evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not thoroughly examined, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, essentially 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 and the potential effects on species with relatively small global populations have not been adequately assessed. From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the assessment does not achieve the standard of proof beyond reasonable scientific doubt. This situation engages the precautionary principle, resulting in an unlawful conclusion regarding consent.

In addition, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction with national policy. Collectively, these factors contribute to the assessment being unreliable, primarily due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the validity of the proposal. The developer commissioned a Social Impact Assessment that involved focus groups with local residents, yet the complete report remains unpublished. This absence of information creates an evidential gap that hinders both the public and the competent authority from fully understanding the social risks identified by the developer's own research.

Initial summaries reveal that local residents are already facing notable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts are grounded in direct engagement with the community and are therefore not merely speculative. However, the failure to disclose the full assessment limits scrutiny of the findings and inhibits an accurate evaluation of their significance in the decision-making process.

Furthermore, evidence suggests that the proposal poses a perceived threat to community identity and cohesion, with the developer's own findings highlighting issues of "cultural loss." Regrettably, these impacts have not been adequately reflected in the main application nor given the weight they deserve. The lack of the full Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be at risk. The failure to provide the complete dataset results in an application that does not offer a comprehensive evidential basis for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. While development should facilitate positive health outcomes and mitigate harm, the available evidence points to existing adverse effects that have not been fully revealed. Without access to the full assessment, it is impossible to ascertain compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, marking a material omission in the application and a failure to meet the evidential standards outlined in the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and underscores the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, aspects that are integral to its undeveloped nature. The introduction of large-scale turbines near the shoreline threatens to impose a continuous industrial presence, which would fundamentally alter this unique character. This change would result in a permanent and irreversible transformation of the landscape, overshadowing the natural beauty that defines the area.

Concerns regarding the assessment of visual impacts are significant. The application fails to accurately represent the magnitude of change that would occur. The sheer scale and close proximity of the turbines mean that they would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such dominance would erode the visual amenity and diminish the defining qualities of naturalness and remoteness within this sensitive landscape, yet this level of impact is not adequately conveyed in the assessment.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not sufficiently capture the most sensitive receptors or worst-case scenarios, particularly related to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Moreover, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections to the Atlantic horizon. However, the assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete understanding of how the proposal would impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This is not merely a visual issue; it represents a broader 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, particularly concerning the protection of natural places and historic assets. The scale of proposed changes contradicts the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any argument for policy compliance.

It is clear that the identified impacts cannot be effectively mitigated. The dominance of the turbines due to their scale, height, and proximity means that their presence would be unavoidable. Consequently, the change would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation measures.

In conclusion, the assessment is inadequate in representing the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation 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 proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern;

however, the application fails to adequately address the severity of these effects and lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not account for the full extent of impacts resulting from this integrated project. The offshore turbines and onshore works are connected, yet they are evaluated separately. This fragmented approach hides the true scale of environmental and socio-economic effects.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically delicate habitat, is part of these works. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively. However, the separation of offshore and onshore elements means the combined effects on peatlands, habitats, and communities are not fully comprehended.

There are substantial risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not prove that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been applied. This results in a clear gap in evidence regarding biodiversity protection.

Additionally, there are concerns related to carbon balance. Disturbance of peatland releases stored carbon, which could lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains advantageous.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

A more pressing concern is the absence of analysis regarding the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment for lighting or a study on phototaxis, thus neglecting the potential effects of aviation lighting on these species and their mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. They also undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife presents a substantial evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and inadequate for supporting a lawful decision.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to comply with the principles of sustainable development when evaluated against statutory obligations, national policies, and evidential benchmarks. It revisits the same fundamental concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This new application is put forth under a more robust policy framework that places increased emphasis on biodiversity, peatland conservation, landscape integrity, and

community wellbeing.

Moreover, the application does not furnish a comprehensive or dependable evidential basis for its assessment. There exist critical deficiencies in baseline data, reliance on an unspecified design envelope, dependence on unelaborated mitigation measures, and the exclusion of essential impact pathways. These include nocturnal wildlife, complete onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete and fails to provide a thorough understanding of significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment amounts to a material omission. These gaps hinder the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the stipulations of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage, nor does it provide assurances that health and wellbeing impacts are acceptable. Furthermore, there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, masking potential repercussions on peatlands, carbon dynamics, habitats, and crofting land.

Environmental risks are uncertain and potentially serious. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in some aspects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion on the acceptability of impacts.

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

In conclusion, the application is fundamentally and procedurally unfit for determination. The volume of information shortcomings, coupled with policy discrepancies and unresolved environmental risks, precludes a lawful and evidence-driven decision. The competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to obtain the outstanding information.

Therefore, 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: DE25BF82

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a dependable account of the anticipated environmental consequences of the proposal. One significant concern is the flexible Project Design Envelope that

does not commit to specific dimensions, layouts, or configurations of turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not truly represent the final development, obstructing both the public and the competent authority from grasping the actual environmental effects involved.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be managed at a later stage undermines meaningful evaluation of their effectiveness and precludes thorough assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the core purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

There are also notable gaps in evidence, which include shortcomings in baseline data, methodological limitations, and the use of assumptions in lieu of site-specific evidence. Such deficiencies lead to uncertainty concerning the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough 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 assessment of marine ecology and protected species is severely lacking, failing to provide a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically rich and sensitive marine system, yet it suffers from incomplete baseline data and inadequate methodologies that do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating

potential impacts.

One significant oversight involves otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased human activity have not been properly evaluated. This gap undermines the conclusions drawn about the absence of significant effects on otters.

The assessment of basking sharks also displays major deficiencies, particularly due to the reliance on aerial surveys, which are prone to detection bias in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to consider or incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby introducing uncertainty regarding the true risk 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. Protected species have not been properly identified or assessed, which leads to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it would be unlawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns related to its impact on seabird populations, particularly given its location within key foraging areas and migratory pathways on the west coast of the Isle of Lewis. This region is known to support internationally important seabird populations, many of which are already in decline. The ornithological assessment accompanying the application is fundamentally flawed, containing notable gaps in evidence and internal inconsistencies that undermine its conclusions. Notably, it fails to demonstrate, to the required evidential standard, that these species will not be adversely affected by the development.

The application exhibits a fundamental contradiction; the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This raises serious concerns regarding the reliability of the assessment, as the conclusions drawn do not align with the underlying evidence. Furthermore, the assessment lacks sufficient evidence regarding the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not adequately recognised, and the modelling approaches employed introduce uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor significantly heightens the risk of creating a barrier for 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 effects on species with relatively small global populations. From a regulatory standpoint, the application falls short of meeting the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with gaps in data and limitations of the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CONSTRUCTION AND POLLUTION RISKS

The proposed works involve significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate potential environmental effects adequately. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be developed after consent is granted, which hampers any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks associated with sediment

mobilisation and potential chemical or oil spills, it does not provide sufficient detail on the methods for prevention, control, or monitoring of such incidents.

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

The lack of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent phase, the application fails to allow for a proper evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are 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 related to environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficiently detailed management plans, and uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to an active fishing industry and a diverse marine ecosystem. The proposal's assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. A critical concern is the unfounded assumption that fishing activity can be displaced without significant consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of handling increased pressure. This gap in information is vital, as the risk of overfishing in other areas could have far-reaching economic implications for the local fishing fleet. Without a solid, evidence-based assessment, understanding the effects on fisheries and local livelihoods remains impossible.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise created during construction. The anticipated use of high-energy hammer piling over an extended duration is likely to disturb marine life over large areas, which is particularly concerning for species like dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population raises alarm, yet the

application diminishes the seriousness of these effects, lacking sufficient evidence to justify such an assertion.

Additionally, there exists a troubling inconsistency within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged even as impacts are simultaneously deemed negligible. This contradiction erodes the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when anticipated harm requires legal authorisation.

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

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

In summary, the assessment is incomplete and unreliable due to a lack of evidence on fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies. These shortcomings hinder a robust evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application reiterates the critical issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was rejected due to the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to address these concerns adequately.

The evidential foundation for the application is incomplete and unreliable, with significant gaps in baseline data and an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to consider crucial impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects and residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment is a violation of statutory obligations under the

Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant failure. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It also 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. The cumulative impact of both offshore and onshore elements has not been properly assessed, which obscures the consequences for peatlands, carbon balance, habitats, and crofting land.

Furthermore, environmental risks associated with the proposal remain uncertain and potentially severe. Assessments related to 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 satisfied, necessitating the application of the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impacts on tourism are permanent consequences that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of informational deficiencies, coupled with policy inconsistencies and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm proposal in its entirety or invoke the relevant regulatory provisions to compel 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: 9A69CB7E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. This development is positioned off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal, combined with its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is critical environmental data that is absent, baseline information that is inconsistent and limited, and numerous key aspects of the proposal that remain undefined. The flexible design framework employed inhibits a clear assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by solid evidence.

There are evident and serious policy conflicts present in the 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 places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability within policy frameworks.

The unprecedented scale of this proposal, with large turbines situated in close proximity to the shore, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit for 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the data collected is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of the species

involved. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable contradiction in the application. The developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies noted also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in assessing the impacts on fisheries and marine life. It lacks a thorough evaluation of ecological and socio-economic consequences, particularly given the diverse marine ecosystem and the active fishing industry off the West Lewis coast. The application does not adequately demonstrate that these habitats and uses can be protected or maintained without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be displaced

without any repercussions. The absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of absorbing additional pressure is a crucial omission. This gap raises serious risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. The lack of a clear, evidence-based assessment means the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to cause disturbances over extensive distances, significantly affecting species such as dolphins. The potential disruption to a large proportion of the local bottlenose dolphin population is a major concern, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There are evident inconsistencies within the application, where the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding adherence to the Habitats Regulations, especially where harm is anticipated to an extent necessitating legal authorisation.

Additionally, the assessment fails to take into account cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This absence of compliance prevents any conclusion that the proposal represents sustainable development.

In summary, the overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment all contribute to a conclusion that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, however, emerges under a strengthened policy framework that emphasises biodiversity, peatland

protection, landscape integrity, and the wellbeing of the community.

There are critical gaps in the evidential basis provided for decision-making. The application is marred by an undefined design envelope, missing key mitigation measures, and omissions concerning the impacts on nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of significant effects and residual impacts.

Procedural missteps are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a significant omission. These inadequacies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

This proposal is fundamentally at odds with the National Planning Framework 4. It fails to ensure the protection of biodiversity and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, there has been inadequate assessment of the cumulative impacts of both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks posed by the proposal are not only uncertain but potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The requisite evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal also threatens to cause considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption to cultural and visual relationships, alongside tourism impacts, will result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of information gaps, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or exercise relevant regulatory provisions to mandate the submission of the outstanding information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B8C57711

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection stems from an analysis of the Environmental Impact Assessment Report and associated documents, which reveal significant deficiencies in planning, environmental considerations, cultural respect, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the project, specifically questioning 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 are notable gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of the likely significant effects, while the unspecified mitigation measures make it impossible to assess their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by adequate evidence.

Furthermore, there are pronounced policy conflicts associated with the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal in this area raises serious concerns about landscape capacity, visual dominance, and environmental impact, given the large turbines planned to be positioned close to the shoreline. The cumulative effect of insufficient information, reliance on undefined mitigation, evidential deficiencies, and clear non-compliance with policy illustrates that the application is incomplete and cannot facilitate a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, resulting in an inadequate and opaque account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders the ability to consistently apply a worst-case scenario and diminishes the reliability of the assessment. Consequently, the impacts outlined may not accurately represent the actual development, leaving both the public and the competent authority unable to fully comprehend the true extent of environmental effects.

Additionally, the application's heavy reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans leads to consent being sought on the premise that environmental harm will be addressed after approval. This deferral of essential information to post-consent stages is unacceptable from a procedural standpoint and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Moreover, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies introduce uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and data gaps renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies inhibit a lawful and thorough evaluation of environmental effects, preventing the competent authority from making an informed decision based on the available information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that hinder a complete understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system. However, the baseline data provided is inadequate, and the methodologies used fail to effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a reliable evidential

basis for evaluating potential impacts.

A notable gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns raises concerns about the assessment of potential effects from construction disturbances, noise, and increased activity. This limitation undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks. The reliance on aerial surveys introduces a significant bias in detection, especially under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or accurately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings suggest that conclusions regarding negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of comprehensive baseline data also restricts the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty complicates the understanding of the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies precludes the possibility of excluding adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Given 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 weaknesses inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a designated migratory corridor on the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately demonstrate, to the required evidential standard, that these species will not be adversely affected. It fails to robustly evaluate critical factors such as displacement, collision risk, or habitat loss associated with the proposed development, particularly given its location within key foraging areas and migratory

pathways.

A fundamental contradiction is evident in the application. While the developer claims there will be no significant adverse effects, it simultaneously puts forth a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that its conclusions lack proper support from the underlying evidence. The assessment inadequately addresses the potential effects on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling approaches introduces a layer of uncertainty, particularly for species that are already experiencing severe declines, like Kittiwakes and Fulmars. Consequently, the methodologies used may underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor introduces significant risks, effectively obstructing a primary flight path that species utilise when travelling between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Regulatory concerns arise from the application's failure to 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, along with data gaps and limitations in modelling, indicates that the assessment has not satisfied the standard of beyond reasonable scientific doubt. This scenario invokes the precautionary principle, which hampers the ability to reach a lawful conclusion in favour of granting consent.

The identified deficiencies also suggest a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such flaws hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a positive determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is characterised as a living cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the assessment of cultural heritage and community identity associated with this area is insufficient, as it treats heritage merely as a collection of isolated and static assets. This approach neglects the dynamic social, cultural, and spiritual roles that these elements play within the community.

Cemeteries located at Dalmore, Bragar, and Barvas are of particular significance, as

they are active sites of burial and spiritual practice. The assessment, however, categorises these sites as static features and fails to account for their ongoing use and meaning, alongside the implications of development on their surrounding environments. This mischaracterisation leads to an incomplete understanding of cultural effects and overlooks the cemeteries' importance to community life.

Moreover, the evaluation does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the long-established relationship between the community and the coastal environment. Such elements are crucial to the area's identity, yet they are completely overlooked, resulting in a substantial omission that hinders a comprehensive understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity and is recognised as Indigenous People. Nonetheless, the process of Free, Prior and Informed Consent has not been implemented, which diminishes the legitimacy of the assessment and fails to adhere to established participatory principles for decisions affecting cultural and environmental matters.

A significant procedural shortcoming is evident in the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment restricts the competent authority's ability to meet its legal obligations regarding the evaluation of social, cultural, and economic impacts on the island community, thereby preventing lawful determination of the proposal.

From a policy standpoint, these oversights place the proposal in direct contradiction 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 disregard for living cultural practices, constitutes a clear deviation from requisite policy standards.

Overall, the combined 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 remain unexamined, and the application fails to offer a solid foundation for assessing the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, fostering a strong sense of remoteness. The proposed large-scale turbines would be positioned near the shoreline, imposing a continuous and dominant industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

The application fails to accurately depict the magnitude of the visual change that would

occur. The height and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define this environment. This significant level of impact has not been adequately conveyed in the assessment.

There are also serious methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. Such shortcomings risk understating the true magnitude of visual impact, which compromises the overall reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship among landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to provide a thorough worst-case assessment further weakens any assertion of compliance with policy.

Moreover, it is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting

is visible over long distances and fundamentally alters the night-time environment. A significant concern arises from the absence of an assessment regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies are a key component of environmental quality, cultural identity, and tourism value in the West Lewis coastline, which is characterised by exceptionally dark skies. The lack of consideration for the importance of dark skies, particularly in relation to emerging sectors such as astro-tourism, creates a substantial gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife, despite the presence of sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are susceptible to disorientation and increased collision risk due to artificial lighting. The application fails to include a lighting impact assessment or phototaxis study, thereby neglecting to evaluate how the aviation lighting might affect these species and potentially increase mortality rates. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not capture 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 assessed.

The lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would be adversely affected. Consequently, the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, which engages the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, rendering it incomplete and incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted unacceptable levels of industrialisation. This new application is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these crucial criteria.

There are critical deficiencies in the evidential basis necessary for a thorough evaluation. The application lacks comprehensive baseline data, continues to utilise an

undefined design envelope, relies on unspecified mitigation measures, and overlooks significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. The Environmental Impact Assessment is therefore inadequate, inhibiting a complete understanding of potential significant effects or residual impacts.

Furthermore, clear procedural failings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligation under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring impacts 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, in some instances, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

The proposal would also lead to substantial and irreversible changes in a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism are permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is procedurally and substantively unfit for determination. The significant information deficiencies, combined with conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either reject the consent application on these grounds or utilise the relevant regulatory provisions to request the missing information.

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

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F2A28A53

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

The application presents significant deficiencies, particularly an inadequate evidential basis for lawful determination. Key environmental data is notably absent, while baseline information remains limited and inconsistent. Furthermore, many aspects of the proposal are not clearly defined. The use of a flexible design framework obscures a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation falls short of providing a complete understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by credible evidence.

Substantial policy conflicts are evident, as the proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not sufficiently demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity are achievable. These discrepancies directly challenge the statutory tests necessary for consent, undermining the competent authority's capacity to deem the development acceptable according to policy standards.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences. Collectively, the insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not

commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively assessed or that suitable safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and insufficient. These shortcomings obstruct a lawful and thorough assessment of environmental effects, thereby placing the competent authority in a position where it cannot make a determination based on the information provided.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected. Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not fulfil the evidential standards required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape, where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity is fundamentally inadequate, adopting a reductive approach that treats heritage as a series of isolated, static assets. This failure to acknowledge the ongoing social, cultural, and spiritual functions of these elements within the community is a critical oversight.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas

represent active places of burial and spiritual practice. Yet, the assessment inaccurately categorises them as static features, neglecting their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects, disregarding their essential role in community life.

Moreover, the assessment does not consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, marking a significant omission that prevents a proper understanding of the cultural impact of the development.

Community rights and engagement further exacerbate the situation. The Gaelic-speaking population possesses a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, which is a significant omission that prevents lawful determination.

From a policy standpoint, these deficiencies 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, clearly departs from policy requirements.

Collectively, the failure 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 properly assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not adequately account for the significant scale of change or the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the extent of this visual change accurately.

The large scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this impact in the context of such a sensitive landscape.

Concerns are also evident regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, thus compromising the assessment's reliability.

Another critical deficiency is the failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets instead of recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a more significant cultural and spatial harm that has not been properly assessed within the application.

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

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

In summary, the assessment does not accurately depict the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The application exhibits a troubling contradiction, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously claiming that such impacts are negligible. This inconsistency undermines the credibility of the

assessment and raises significant concerns regarding adherence to the Habitats Regulations, particularly in instances where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic consequences. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to convincingly demonstrate that these essential uses and habitats can be preserved or maintained without considerable disruption.

A critical issue is the presumption that fishing activity can be relocated without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or able to endure added pressure. This significant omission poses risks of overfishing in other locations, which may lead to broader economic ramifications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the impacts on fisheries and local livelihoods remain inadequately understood.

Additionally, the proposal introduces considerable risks to marine species, especially through the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, affecting species such as dolphins. Concerns arise from the predicted disturbance to a significant portion of the local bottlenose dolphin population, yet the application tends to downplay the importance of these effects without adequate supporting evidence.

The assessment also neglects to consider the cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

In summary, the deficiencies in the assessment—including the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions—render it incomplete and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking and does not account for the full range of impacts associated with this integrated project. The offshore turbines and the associated onshore works are fundamentally interconnected, yet they are evaluated in isolation, leading to a disjointed analysis that fails to reveal the true magnitude of environmental and socio-economic repercussions.

Included in the onshore components are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By neglecting to address or postponing the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively; however, the disconnection between the offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are notable risks posed to sensitive habitats, such as machair systems and peatland environments that are under policy protection. The application does not provide sufficient evidence that the impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 assessment of tourism impacts related to the proposed development is fundamentally inadequate and does not address the economic and social

repercussions for a crucial sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are vital to tourism, which has seen substantial 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. Despite acknowledging that 86% of visitors are motivated by scenery, the application fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Furthermore, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the development could result in a net economic benefit or detract from an established and burgeoning sector.

The assessment neglects to consider the significance of environmental quality in enhancing the tourism experience, particularly regarding the value of unspoiled landscapes and dark skies for visitors, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognized and expanding segment of the local economy.

Given the island's limited economic diversification, the failure to evaluate tourism impacts poses 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 standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the requirement to demonstrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap, undermining the ability to conduct a thorough evaluation of the economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the same central issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This new proposal is now presented

within a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

A complete and reliable evidential basis for determination is not provided. There are notable gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose the entire Social Impact Assessment constitutes a serious omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal directly contradicts National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been thoroughly evaluated, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and impeding a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either reject the application on these grounds or invoke the 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

I wish to object to this planning application as it is the industrialisation of an our wilderness and seascape that will destroy an unblemished view and environment all in the name of profit.

Local jobs and economic development brought by this development is non comparable to the loss of our wilderness and cumulative environmental impacts.

There is no climate emergency agenda that requires such loss of precious habitats and impact on views- this area is not a development site for corporate profit.

There is no national strategy in place the considers the cumulative effect of all wind power planning applications across Scotland and the Highlands and this is wrong in how so many communities are being affected.

This is corporate greed, industrialisation of our landscape and new Highland Clearances (views and remoteness loss) and just so wrong.

It is unbelievable that this planning application has even thought to be conceivable by a developer and their consultants.

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: 5A06808F

