

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation has revealed material deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development site, located off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a near-pristine environment, and a rich cultural identity. The scale and proximity of the proposed turbines, along with the design, raise serious concerns about compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a robust evidential basis for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework employed limits the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to offer a full or informed understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which lack solid evidence.

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

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In such circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a complete, transparent, or reliable overview of the potential environmental effects associated with the proposed development. A flexible Project Design Envelope is employed, lacking commitment to specific dimensions, layouts, or configurations for the turbines. This introduces considerable uncertainty and hampers the consistent application of a worst-case scenario analysis, undermining the assessment's integrity. As a result, the impacts outlined may not accurately reflect what will ultimately be constructed, obscuring the true extent of environmental effects from both the public and the competent authority.

The application heavily relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions means that environmental harm is expected to be addressed after the fact, which hinders any meaningful evaluation of the effectiveness of such measures or the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and necessary mitigation must be clearly established before determination.

Moreover, there are substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such inadequacies result in uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are presented without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory requirements.

Consequently, the application does not meet the evidential threshold stipulated 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. The proposal also does not demonstrate compliance with National Planning Framework 4, specifically regarding biodiversity protection and environmental integrity, as it cannot be proven that impacts have been fully assessed or that adequate safeguards are in place.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical

for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces another significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are

deeply intertwined. The approach taken is overly simplistic, viewing heritage merely as a collection of static assets rather than appreciating their dynamic social, cultural, and spiritual significance within the community.

A significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, they are characterised merely as static features in the assessment. This oversight fails to acknowledge their ongoing significance and the implications of development on their surroundings, leading to an incomplete analysis of cultural effects and disregarding their importance in the fabric of community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of publication of the full Social Impact Assessment commissioned by the developer represents a significant evidential gap. This omission prevents both the public and the competent authority from fully understanding the social risks identified through the developer's own research, hindering proper scrutiny of the findings. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are derived from direct engagement, not speculation, yet the withholding of the full assessment limits the ability to determine their significance within the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given the appropriate weight. The non-disclosure of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this scale, especially when community character and functioning may be affected. Without the full dataset, the application fails to provide a complete evidential basis for assessing the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and avoids harm. However, the available evidence indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading

to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a materially incomplete assessment of onshore infrastructure, failing to fully account for the impacts of what constitutes a single integrated project. The offshore turbines are linked with the onshore works, yet these components are evaluated separately, leading to a fragmented approach that obscures the actual extent of environmental and socio-economic effects.

Specifically, the onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. This construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. Without a comprehensive assessment of these impacts, the application does not provide a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not adequately understood.

Concerns also arise regarding the potential risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protections. The application does not demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, thus revealing a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises serious questions about carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is no evidence provided that necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

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

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts

render this section of the application incomplete and unreliable, ultimately preventing a lawful determination.

SUMMARY

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

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

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

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

The proposed development would lead to considerable and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

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

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

Yours faithfully,

[Redacted]

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies concerning planning, environmental factors, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region known for its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural identity. Concerns arise from the scale, proximity, and design of the project, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful decision. There is a troubling absence of critical environmental data, with baseline information being limited and inconsistent, while important elements of the proposal remain undefined. The flexible design framework used complicates a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed grasp of the environmental, cultural, or community impacts. Claims regarding negligible or non-significant effects lack robust evidence to support them.

There are notable and substantive policy conflicts present. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It fails to demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to determine the development's acceptability within policy parameters.

The unprecedented scale of the proposal raises significant concerns about its impact on the local landscape, with large turbines positioned alarmingly close to the shoreline, which threatens to dominate the visual environment and adversely affect the ecology. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of

providing a structured comparison of realistic alternatives based on their environmental effects, the application offers a narrative of project development. This method does not adequately show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is a lack of transparent and evidence-based comparisons of offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in determining impact, the failure to conduct such an analysis prevents any conclusion that the proposed siting is the least damaging option available.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes important cultural and spiritual sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that there has been no application of mitigation by design, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to an incomplete and unreliable understanding of ecological receptors. This area, known for its biological activity and sensitivity, is not adequately represented by the baseline data provided. The methodologies employed fail to effectively capture the presence, behaviour, and habitat utilisation of crucial species. Consequently, the assessment falls short of offering a solid evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a species protected under European law, which are not sufficiently acknowledged in their use of coastal regions for foraging and movement. The assessment does not adequately consider their core foraging range and behavioural patterns. This oversight raises concerns about the evaluation of potential

construction disturbances, noise, and increased activity, leaving the conclusions regarding the absence of significant effects on otters unsubstantiated.

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

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

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

In summary, the assessment's unreliability stems from incomplete baseline data, inadequate methodologies, and unsupported conclusions. These critical flaws obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabird species that are already in decline, yet the ornithological assessment provided is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately evaluate the implications of habitat loss, displacement, or collision risk, despite the development being situated within key foraging areas and migratory pathways.

A fundamental contradiction exists in the application, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This approach is only necessary when significant harm is anticipated, which raises serious doubts about the reliability of the assessment. It suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The

crucial importance of these feeding grounds is inadequately addressed, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of the birds are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a significant risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations been adequately considered.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. The deficiencies noted also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. Overall, 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 collectively lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the application fails to acknowledge this connection and instead adopts a simplistic view of cultural heritage as isolated, static assets, disregarding their vital social, cultural, and spiritual roles within the community.

A notable shortcoming is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their ongoing use and the significance of their settings. This misrepresentation leads to an incomplete understanding of the cultural effects of development, failing to respect their importance in community life.

Moreover, the assessment does not take into account intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's

identity and are glaringly absent from the assessment, which is a significant oversight. Without evaluating these aspects, the cultural impact of the proposed development remains inadequately understood.

Concerns also arise around community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity with attributes that align with those of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to honour established principles regarding participation in decisions that affect cultural and environmental interests.

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

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

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and legal obligations leads to a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as such, the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report has not been published. This significant evidential gap hinders both public understanding and the ability of the competent authority to grasp the full extent of social risks identified through the developer's research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative in nature. However, the failure to disclose the complete assessment limits proper scrutiny of the findings and obscures their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Unfortunately, these impacts have not been fully incorporated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must facilitate positive health outcomes and mitigate harm. The available evidence suggests existing adverse effects that have not been fully revealed, thus preventing the demonstration of compliance with this policy in the absence of the full assessment.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy hampers 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 a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally altering the landscape and leading to a permanent transformation of its character. The assessment of visual, seascape, and landscape impacts is significantly deficient, failing to accurately reflect the extent of change or the sensitivity of the surrounding environment.

The application does not sufficiently convey the magnitude of visual alteration. Due to 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 defining qualities of naturalness and remoteness. This level of impact is not properly articulated within the assessment, nor is its significance considered in the context of such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Evidence indicates 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 deficiency risks underestimating the magnitude of visual impact, thereby compromising the reliability of

the assessment.

Additionally, there is a failure to assess the interconnected nature of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, 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 perceived and disrupting their connection to the natural horizon. This represents a visual impact, alongside broader cultural and spatial harm that has not been adequately examined within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural environments and historic assets. The scale of change proposed is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further undermines any assertion of compliance with relevant policies.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominating and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to properly assess construction and pollution risks, rendering the environmental evaluation fundamentally inadequate. It involves extensive seabed preparation and installation within a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified future mitigation and contingency measures, which hinders any meaningful assessment of their effectiveness or sufficiency.

This dependence on vague future strategies is particularly alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

Moreover, the lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application precludes evaluation of whether suitable safeguards are in place for responding to pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical 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 absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough evaluation of ecological and socio-economic impacts related to fisheries and marine life. Off the West Lewis coast, there exists both a diverse marine ecosystem and a functioning fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and activities will be protected or maintained without significant disruption.

One of the critical flaws in the application is the assumption that fishing activity can be relocated without consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can support the additional pressure that would result from such displacement. This oversight is crucial, as it poses a risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a comprehensive and evidence-based assessment, the implications for fisheries and the livelihoods they support remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended duration is expected to create disturbances across significant distances, potentially impacting species such as dolphins. The anticipated disturbance

to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application diminishes the importance of these effects and fails to provide adequate supporting evidence.

In the application, there is an evident inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing potential impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment does not account for cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the absence of evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions present in the application render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is significantly lacking, failing to account for the full range of impacts associated with what constitutes a singular integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently. This fragmented approach obscures the comprehensive scale of the environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not offer a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively, yet the disconnection between offshore and onshore elements results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities. There

are also considerable threats to sensitive habitats, including machair systems and peatland environments, which are designated for policy protection. The application fails to show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, revealing a significant evidential gap regarding 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 provide evidence that the necessary consents or processes have been initiated, prompting concerns over deliverability and lawful execution. From a policy standpoint, the inability to assess the project comprehensively and to illustrate the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of demonstration that impacts can be avoided or mitigated further undermines the credibility of the application.

Overall, the separation of project elements, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

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

TOURISM

The Isle of Lewis tourism sector, which has seen growth from £65 million in 2017 to over £81.5 million, is critical to the local economy, supporting more than 1,000 jobs and representing up to 16% of the island's economy. The application under review does not adequately assess the economic and social impacts that could arise from large-scale offshore infrastructure development, which could threaten this vital sector. Despite recognising that 86% of visitors are attracted by the area's stunning scenery, the assessment does not quantify how this proposed industrialisation would affect visitor numbers, their behaviour, or the overall economic contribution of tourism.

Additionally, the assessment neglects to evaluate how the environmental quality crucial to tourism, such as unspoiled landscapes and dark skies, may be compromised. This oversight is particularly concerning given the importance of these factors for the growing fields of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a notable gap in understanding the potential impacts on a vital part of the local economy.

In an island community with limited economic diversification, the lack of consideration for tourism impacts carries broader implications for employment, local businesses, and the sustainability of communities. Furthermore, the failure to conduct an Island Communities Impact Assessment as mandated by the Islands (Scotland) Act 2018 means that these economic vulnerabilities have not been appropriately evaluated.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails 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 evaluate environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence create a substantial evidential gap. This gap undermines any robust evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

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 deeply concerned about the environmental and ecological impacts of this proposal. There are significant populations of threatened and endangered marine species, as well as birds both on and offshore which will be impacted by the construction.

I am particularly concerned about the flapper skate breeding grounds which are only recently being recorded in Uig, and indicated a significant population.

I am very worried about the cost to the environment in vibrations and noise pollution, both audible and infrasonic, to the cetaceans migrating and breeding in this area.

The impact on this Dark Skies area from night lighting of these structures will irrevocably damage the ecosystem, as well as having an impact on the cultural and spiritual practices of those of us who observe celestial dates of significance from sites in Lewis, and can witness the Mirry Dancers, the Northern Lights.

The impact on mental health of residents and those of us with family in the area cannot be understated. This is an area used as respite and to reconnect with nature, it will be deeply damaging to interrupt this with the constant marine traffic during construction and the interruption of the horizon line which brings deep spiritual solace to so many.

I am offended by the co-opting of Gaelic language in the naming of this project, it is tone deaf and insulting to name it in a minority language when this is a majority Canadian lead project.

Additionally, it brings only environmental, health, and cultural costs, but offers no benefits to local energy prices and localised small scale infrastructure.

The commodification of these landscapes for profit is unconscienceable and antethical to a future in which local residents are respected and provisioned with a sustainable alternative to fossil fuels. The particulate and carbon emissions of the transport of workers and materials to the island, and the construction of worker housing, the impact on roads, and of course the shipping of materials to the furthest northwest corner of the UK, is nonsensical in a time when we should be conserving fossil fuels and reducing emissions.

These islands host rare, endangered or threatened insects, birds, marine life, mammals and plants which cannot become collateral in a greenwashing project such as this. These are irreplaceable.

This project is deeply unpopular locally, and having spoken to my family and peers who live permanently in the area they are concerned about the impact on their livelihoods, which are mainly in tourism and wildlife tourism or environmental conservation. My family specifically will be impacted as the view from our croft is one which takes in a Site of Outstanding Natural Beauty and is a major draw for the tourists on whom my family rely for their business, it will be marred by this industrial development and interrupt the views of the sea and the northern lights.

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: CE34DA4D

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 lacks completeness and does not provide a full or reliable account of the likely environmental effects of the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine

dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent assessment of worst-case scenarios. As a result, the integrity of the assessment is undermined, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach postpones the evaluation of environmental harm, which prevents any meaningful assessment of effectiveness or residual impacts. Deferring key information to post-consent stages is procedurally inappropriate and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also considerable evidential gaps, including insufficient baseline data and methodological limitations, along with reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold outlined in 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 does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

The combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough 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 of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

A notable shortcoming is the inadequate recognition of otters, classified as a European

Protected Species. The application does not effectively assess their active utilisation of coastal regions for foraging and movement. This oversight in considering their core foraging range and behavioural tendencies means that potential impacts from construction disturbances, noise, and increased human activity have not been properly evaluated, undermining claims regarding the lack of significant effects on this species.

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due to reliance on aerial surveys, which are prone to significant detection bias under Atlantic conditions. This approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological deficiencies imply that assertions of negligible or non-significant effects are based on assumptions rather than substantiated evidence. The absence of adequate baseline data also hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the overall conclusion that the application does not possess a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development fails to meet the necessary evidential standards regarding the impact on ornithological factors, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. The application does not sufficiently demonstrate that these species will remain unaffected, despite being situated in key foraging areas and migratory pathways. There is a clear lack of robust evaluation regarding displacement, collision risk, or habitat loss, which raises concerns about the adequacy of the ornithological assessment.

There is a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats

Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency undermines the reliability of the assessment and highlights the lack of support for its conclusions based on the available evidence.

Moreover, the assessment does not adequately address the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches introduces uncertainties, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional significant risk by creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term implications of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory viewpoint, the application does not fulfil the evidential threshold needed to confirm no adverse effects 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 invokes the precautionary principle, which prohibits a lawful conclusion in support of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a rich cultural landscape where the environment, language, tradition, and community are deeply intertwined. The assessment of cultural heritage and community identity is fundamentally inadequate, as it treats heritage merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are particularly overlooked. These sites serve as active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the implications of development on

their setting results in an incomplete evaluation of cultural effects, neglecting their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and traditions, as well as the long-standing relationship between the community and the coastal environment, is not assessed. These elements are essential to the area's identity and their absence represents a significant omission. Without this consideration, it becomes impossible to properly understand the cultural impact of the proposed development.

Concerns extend to community rights and engagement, particularly given that the Gaelic-speaking population holds a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a Free, Prior and Informed Consent process undermines the assessment's legitimacy, failing to uphold established principles of participation in decisions that affect cultural and environmental interests.

Compounding these issues is the critical procedural failure regarding the absence of a compliant Island Communities Impact Assessment, 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, rendering any determination unlawful.

From a policy standpoint, these deficiencies put the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, marks a clear deviation from policy requirements.

Overall, the failure to properly assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid basis 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, resulting in a deficient evaluation. The developer undertook a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from fully grasping the social risks highlighted by the developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects are based on direct engagement, rendering them non-speculative. Nevertheless, the failure to disclose the full assessment limits proper scrutiny of these findings and obstructs the ability to evaluate their relevance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Unfortunately, these significant impacts have not been sufficiently integrated into the primary application or afforded the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when the character and functioning of the community could be at stake. The failure to provide the full dataset means that the application does not offer a complete evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; yet, the evidence available suggests existing adverse effects that have not been thoroughly disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission is significant within the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans significantly undermines the assessment of construction and pollution risks associated with the proposal. This lack of detail is particularly troubling given the extensive seabed preparation and installation works planned within a high-energy Atlantic environment. The application's reliance on mitigation and contingency measures that will only be formulated post-consent hinders a meaningful evaluation of their potential adequacy or effectiveness.

This situation is exacerbated by the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vital habitats that are susceptible to sediment

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

Moreover, there exists considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies prevents a clear determination of the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent has been granted limits the ability to ascertain whether appropriate safeguards are available to address potential pollution events. This creates procedural risk and weakens the competent authority's capacity to evaluate environmental protection measures at the moment of determination.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the application lacks a thorough assessment of the ecological and socio-economic impacts on these resources. It fails to show how these uses and habitats can be maintained without causing significant disruption.

A major concern is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds are available or can sustain the additional pressure. This is a crucial oversight, as displacement could lead to overfishing in other areas and might have wider economic repercussions for the local fishing fleet. Without a proper, evidence-based evaluation, the effects on fisheries and livelihoods are not fully understood.

Additionally, the proposal poses serious risks to marine species due to underwater noise during construction. The use of high-energy hammer piling for extended periods

could disturb marine life over large distances, particularly affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimises these impacts without adequate supporting evidence.

The application inconsistently acknowledges the need for licences to allow harm to European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Moreover, the assessment does not address the cumulative impacts of multiple stressors, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains unclear.

From a policy standpoint, the application does not comply with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This lack of compliance prevents a conclusion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, as it fails to adequately evaluate the onshore infrastructure and its impacts as part of a unified project. The offshore turbines and the associated onshore works are inextricably linked, yet they have been assessed separately, leading to a disjointed evaluation that obscures the true extent of the environmental and socio-economic implications.

The onshore components comprise cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, which is both an important carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore effects, the application impedes the proper consideration of cumulative impacts. The Environmental Impact Assessment process stipulates that all parts of a project should be reviewed collectively. However, the distinction between offshore and onshore elements has

resulted in a failure to fully comprehend the combined effects on peatlands, local habitats, and surrounding communities.

Moreover, there are substantial risks to sensitive ecosystems, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also emerge from this proposal. The disturbance of peatland can release stored carbon, potentially incurring a carbon debt that counters the aims of renewable energy initiatives. The application does not convincingly address this concern or show that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with current land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, which raises issues about the project's viability and lawful execution.

From a policy viewpoint, the failure to assess the project in its entirety and to demonstrate protection for 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 credibility of the application.

In conclusion, the fragmented approach to the assessment of project components, the absence of a comprehensive evaluation, and the lack of evidential support concerning environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an assessment of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and the potential growth of astro-tourism. The lack of consideration for these impacts creates a notable gap in the overall landscape and environmental assessment.

Furthermore, the proposal does not assess the effects of artificial lighting on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and

Leach's Storm Petrel are at risk of disorientation and collision due to phototaxis, yet the application omits any lighting impact assessment or phototaxis study. This means there is no analysis of how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leaves a critical gap in understanding ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. This failure also undermines the overall assessment of landscape and seascape impacts, as night-time character is a vital component of the environment.

In summary, the complete absence of assessments concerning dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards required for sustainable development when evaluated against statutory responsibilities, national policies, and evidence-based criteria. This application echoes the primary concerns that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Currently, this proposal is presented under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant issue with the application is its lack of a comprehensive and reliable evidential foundation for assessment. It exhibits critical gaps in baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits important impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the nondisclosure of the complete Social

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

Furthermore, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. The application also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to an obscured understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

Overall, the application is fundamentally unfit for determination, both procedurally and substantively. The extensive information gaps, combined with policy inconsistencies and unresolved environmental risks, obstruct any lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory measures to necessitate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A5F0932D

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

Dear Sir/Madam

This letter constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. There are significant concerns about the scale, proximity, and design of the proposal in relation to its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, and the baseline information presented is limited and inconsistent. Key aspects of the proposal remain undefined, and the flexible design framework employed prevents a clear understanding of potential significant effects. Furthermore, reliance on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to offer a comprehensive or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national requirements to safeguard biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly undermine the statutory tests required for 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 raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly with large turbines positioned in close proximity to the shoreline. 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. Under these circumstances, the precautionary principle must be applied.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a structured and evidence-based assessment of alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of viable

alternatives based on their environmental effects, it provides a narrative that merely recounts the project's development. This failure to adequately explore and identify less harmful options means that more damaging solutions may have been improperly prioritised.

Furthermore, there is a notable absence of a transparent comparison of different offshore locations, scales of development, or design configurations. The application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, an approach that would likely mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the lack of analysis on this aspect raises serious concerns about the proposed siting's validity as the least damaging option.

The shortcomings are also evident in the analysis of cable routing and landfall assessments. There is insufficient evidence provided to indicate that alternative routes have been thoroughly investigated to minimise impacts on sensitive receptors, including culturally significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, coupled with a lack of comparative analysis, suggests that the design has not incorporated mitigation measures effectively, relying instead on post-design measures that may not sufficiently address the concerns.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, infrastructure routing, and layout. This oversight represents a failure to adhere to the established mitigation hierarchy, which is essential for ensuring that less harmful and more suitable alternatives are properly evaluated. The absence of a rigorous assessment of alternatives raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies impede compliance with National Planning Framework 4, particularly regarding the preservation of natural environments, cultural heritage, and the well-being of local communities. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents a range of significant deficiencies that compromise its reliability. This coastal environment in West Lewis is both sensitive and biologically active. However, the baseline data provided is incomplete, and the methodologies employed fail to effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a robust evidential foundation for evaluating impacts.

A critical gap exists concerning otters, which are classified as a European Protected Species. The application inadequately recognises and assesses their use of coastal

areas for foraging and movement. The omission of core foraging ranges and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been thoroughly evaluated. This lack of assessment undermines any assertions regarding the absence of significant effects on otters.

In addition, the evaluation of basking sharks suffers from substantial shortcomings. The reliance on aerial surveys introduces a detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in a flawed baseline, diminishing the validity of the conclusions drawn.

These methodological limitations yield conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. Moreover, the insufficiency of baseline data hinders the ability to assess cumulative and indirect impacts meaningfully, including seasonal variations and broader ecosystem interactions. This absence of clarity creates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements established under the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The resulting level of uncertainty obstructs the ability to rule out adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that is fundamentally unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application does not rest on a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable contradiction in the application. The developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies noted also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a simplistic view, treating heritage as isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

There is a notable deficiency in the treatment of culturally significant sites, specifically the active burial grounds at Dalmore, Bragar, and Barvas. These places serve as essential locations for burial and spiritual practice, yet the assessment considers them as static elements, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their vital role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and local traditions, which are integral to the area's identity. This significant omission hampers the understanding of the cultural impact of the development. The lack of assessment of these vital cultural elements further diminishes the validity of the evaluation.

Concerns also arise regarding community rights and engagement, particularly for the Gaelic-speaking population, which embodies a distinct cultural identity characteristic of an Indigenous People. The absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment, failing to meet established principles of community participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering a lawful determination impossible.

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

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the legality of the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Summaries indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct engagement and are thus firmly grounded in evidence rather than speculation. Nevertheless, the lack of access to the full assessment impedes proper scrutiny of the findings and limits the determination of their significance within the broader decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting concerns around “cultural loss.” Despite this, such impacts have not been adequately incorporated into the primary application nor afforded the appropriate weight in the evaluation. The failure to disclose the complete Social Impact Assessment conceals the true human and social costs associated with the proposed development.

This deficiency in transparency also 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 functioning are at stake. By not providing the complete dataset, the application lacks the necessary evidential foundation to properly assess the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, existing evidence suggests there are adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be adequately demonstrated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to adhere to the evidential standards set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the documented existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application fails to adequately reflect the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment lacks a proper depiction of this impact and its significance in light of the landscape's sensitivity.

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern; however, the application fails to adequately address the severity of these effects and lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community

wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Moreover, the process has encountered clear procedural failings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components is insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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

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

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

Additional Comments

My wife's ancestors are buried in Dalmore and Bragar Cemeteries. I've been visiting Lewis for over 25 years and have grown to love the unique atmosphere and the wildlife of this beautiful place. I have gazed over the sea many times and wondered at the smallness of human life and the vastness of the earth and its oceans. I am deeply concerned at the human race's treatment of the earth and concerned about our young peoples' future and what we are bequeathing them, expecting them to sort it all out at a later date. I am all for the turning away from fossil fuel energy towards harnessing the powers that exist on this earth to power our future. I simply do not accept that a huge phalanx of giant turbines dropped into the sea, which cannot turn if there is no wind and also if there is too much wind, are part of the answer to solving our energy requirements in the future. They will disrupt the animals that live in the sea, the birds that fly around them in the air. They will disrupt the quiet reflection of islanders remembering their ancestors. They will serve as a constant demonstration to every soul who looks upon them that the human race is determined to rule the earth, rather than work with it. Wave power, not wind power is the answer here. Our young people can currently look out from Dalmore and Bragar cemeteries to the West, consider that their ancestors also looked out at this same view, and wonder about their own place in this wonderful world. By building these turbines, if the application were to be granted, is sending a message to these young people that their forbears have decided their place for them, to clean up the mess we left them. I fervently object to these 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: CD44E6BD

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 comprehensive review of the Environmental Impact Assessment Report and the associated documentation, revealing material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and significant cultural identity. Concerns regarding its compliance with statutory requirements, national policy, and the principles of sustainable development arise from the proposal's scale, proximity, and design.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework employed obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the provided documentation fails to offer a comprehensive or informed view of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

The proposal presents clear and substantial conflicts with existing policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. Furthermore, the application does not demonstrate that it can meet national obligations regarding biodiversity protection, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent, compromising the competent authority's ability to conclude that the development is acceptable according to policy.

In this location, the scale of the proposal is unprecedented, with large turbines positioned near the shoreline, which raises significant concerns about landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity fails to acknowledge this relationship and adopts a reductive view, treating heritage merely as isolated, static assets. This approach neglects their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. The assessment, however, erroneously categorises them as static features, overlooking their continued use and the development's impact on their surroundings. This mischaracterisation results in an incomplete evaluation of the cultural effects and disregards the sites' importance to community life.

Moreover, the assessment does not consider intangible cultural heritage, including the Gaelic language and traditions, which are integral to the area's identity. The failure to include these elements represents a substantial omission that impedes a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles regarding participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment contravenes the statutory requirement set out in the Islands (Scotland) Act 2018. Without this crucial assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination.

These shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the living cultural practices of the community, constitutes a clear deviation from policy requirements.

Ultimately, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The application does not adequately address the cultural impacts of the development, providing an insufficient basis for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that hampers understanding of the social risks identified by the developer's own research. This lack of transparency is critical, as it prevents both the public and the competent authority from grasping the complete picture.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. Nevertheless, the non-disclosure of the full assessment restricts proper scrutiny of these findings and inhibits the ability to assess their significance in the decision-making process.

There are indications that the proposal is seen as a direct threat to community identity and cohesion, with references to "cultural loss" emerging from the developer's own findings. Despite this, these impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude. Particularly where community character and functioning may be influenced, the failure to provide the complete dataset results in an incomplete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must support positive health outcomes and avoid causing harm, yet the evidence available indicates that existing adverse effects have not been fully disclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of these omissions are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Moreover, the application fails to adequately reflect the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities that define naturalness and remoteness. The assessment lacks a proper depiction of this impact and its significance in light of the landscape's sensitivity.

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

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

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

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

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

In summary, the assessment falls short in accurately portraying the scale of impact, the

sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This proposal echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. It is now being presented under a policy framework that places heightened importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this proposal. Critical gaps exist in baseline data, and the application relies on an undefined design envelope with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Moreover, the application demonstrates clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission that prevents the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits, particularly due to the absence of tourism impact modelling. 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.

Uncertainty persists regarding the environmental risks associated with this proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to conclusively exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

The proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of

dark skies, and the disruption of cultural and visual relationships would result in permanent effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, policy conflicts, and unresolved environmental risks preclude a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent for this application or invokes the appropriate regulatory measures to secure the submission of the required missing information.

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

Additional Comments

The visual impact of the wind farm should not be underestimated. The presence of large-scale turbines offshore may significantly alter the natural seascape, affecting the character of the coastline and the enjoyment of residents and visitors alike. In regions where tourism and natural beauty are key to the local economy, this could have lasting negative consequences.

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: 466AAA46

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, as these factors fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures hinders the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident within the proposal. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate adherence to national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to affirm the development's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance underscores the application's incompleteness and its incapacity to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application fails to adequately address the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are closely interconnected. Rather than recognising this dynamic relationship, the application adopts a narrow perspective that reduces heritage to a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practices; however, they are mischaracterised as static features in the assessment. This oversight fails to take into account their continued use and importance, as well as the potential impacts of development on their settings. As a result, the evaluation of cultural effects is incomplete, neglecting their vital role in community life.

Additionally, the application overlooks crucial aspects of intangible cultural heritage, such as the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These elements are fundamental to the identity of the area but are glaringly absent from the assessment. Ignoring these factors compromises the understanding of the cultural impact of the proposed development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population holds a unique cultural identity, recognised as having characteristics of an Indigenous People. However, the application lacks a process of Free, Prior and Informed Consent, which diminishes the credibility of the assessment and fails to adhere to established principles of meaningful participation in decisions that affect cultural and environmental interests.

Moreover, a significant procedural failure is highlighted by the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community. This omission alone raises questions about the lawfulness of the determination process.

From a policy perspective, these deficiencies directly conflict with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The oversight of both tangible and intangible heritage, coupled with the failure to acknowledge living cultural practices, illustrates a clear deviation from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and compliance with statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately

evaluated, leaving the application without a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical concern that undermines the entire evaluation process for this application. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap hinders both public understanding and the competent authority's ability to gauge the full scope of social risks identified through the developer's own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The failure to release the complete assessment restricts proper scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process as well. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning are concerned. By failing to provide the complete dataset, the application lacks a thorough evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not satisfy the requirements outlined in National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the existing evidence suggests that adverse effects have not been fully disclosed. Without the full assessment, the application cannot demonstrate compliance with this policy.

The procedural ramifications are significant as well. The competent authority is unable to conduct 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 standards demanded by the Environmental Impact Assessment regime.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment

and evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly flawed and does not adequately capture the extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unobstructed Atlantic horizon, natural state, and pronounced sense of isolation. The proposed installation of large-scale turbines in close proximity to the coast would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a lasting and irrevocable alteration of the landscape.

Moreover, the application inadequately conveys the scale of this visual transformation. The turbines would overshadow views from residential locations, historical sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately reflect this level of impact or its significance, particularly within the context of such a delicate landscape.

There are also serious methodological issues concerning the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints might not effectively capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the assessment's reliability.

Additionally, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interlinked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these sites in isolation rather than recognising their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case evaluation further weakens any assertion of compliance with policy.

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

In summary, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Furthermore, the proposal does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given that dark skies are integral to the area's identity and to developing tourism sectors like astro-tourism. The lack of consideration for these impacts results in a discernible gap in the overall landscape and environmental evaluation.

There is also a critical failure to assess potential impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risk of collision. The application does not contain any lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting may influence these species or contribute to increased mortality rates.

This issue 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 example, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a crucial gap in understanding the ecological impacts.

Without the necessary assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents a

lawful decision-making process.

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

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

TOURISM

The assessment of the proposed development fails to adequately consider the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism relies heavily on the area's natural assets, such as its wild coastline, unspoiled landscapes, dark skies, and overall sense of remoteness. Although the application indicates that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers or their behaviour, nor does it assess the potential effects on the overall economic contribution from tourism.

Tourism on the island has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, representing up to 16% of the local economy. Nonetheless, the application lacks a thorough examination of how the industrialisation of the seascape and potential decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the proposed development would provide a net economic benefit or adversely affect this essential sector.

Moreover, the assessment neglects to acknowledge the significance of environmental quality for tourism, particularly how pristine landscapes and dark skies enhance the visitor experience and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in understanding the potential implications for this recognised and expanding segment of the local economy.

In an island community that faces challenges due to limited economic diversification, the failure to evaluate tourism impacts carries broader consequences for employment, local enterprises, and the sustainability of the community. The absence of a proper Island Communities Impact Assessment means that the economic vulnerabilities associated with tourism have not been appropriately addressed, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the

necessity to illustrate a net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and lacks the necessary evidence for competent authorities to gauge the economic ramifications of the proposal.

Ultimately, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance culminate in a significant evidential shortfall. This gap hampers the ability to carry out a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards for sustainable development. It does not satisfy statutory duties, national policy, or evidential standards. Similar issues were present in the rejected 2008 Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current application is under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant gaps in the information provided. The application relies on an undefined design envelope and on unspecified mitigation measures, which are critical oversights. Essential impact pathways have been omitted, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to present a full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain uncertain and potentially significant. The assessments are incomplete and sometimes inconsistent. The evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and preventing a lawful conclusion regarding the acceptability

of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should refuse consent or require the submission of the missing information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

Having grown up on the west side of the Isle of Lewis I find the proposal of this wind farm incredibly upsetting. I worry it would ruin the local landscape and natural beauty of our island. I feel this is very unfair and would be a complete eyesore and have terrible effects on the mental health of the local community who would be subjected to look at it every day. It would be better to consider moving elsewhere where it is not in sight on the community.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A87D6BAF

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 completeness and transparency, failing to provide a reliable account of the anticipated environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable

uncertainty. This lack of specificity undermines the integrity of the assessment and means that the reported impacts may not accurately reflect the final development, thus preventing both the public and the competent authority from fully understanding the actual environmental effects.

The application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the basis that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates clear establishment of likely significant effects and mitigation prior to determination.

There are substantial evidential deficiencies in the report, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainties regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, particularly concerning 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 combination of reliance on an undefined design envelope, absence of specified mitigation strategies, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects, meaning that the competent authority is not adequately equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on environmental effects, the submission presents a narrative of project evolution. This approach does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning

alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the significant impact of proximity to shore, the lack of such analysis prevents any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to establish a clear avoidance strategy and the lack of comparative analysis show that mitigation by design has not been applied, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been reduced through careful site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, obstructing the competent authority from understanding whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be asserted that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is severely lacking, resulting in an incomplete understanding of the ecological receptors within the West Lewis coastal environment. This region is a biologically active marine system, yet the baseline data provided is insufficient, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, classified as a European Protected Species. The application neglects to acknowledge and assess their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects from construction disturbances, noise, and increased activity. This gap undermines the conclusions drawn regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks suffers from significant deficiencies, particularly due to the reliance on aerial surveys, which introduce considerable detection bias in Atlantic conditions. This methodology is likely to underestimate the

presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to include or adequately consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk posed to marine species and habitats.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is alarming and raises serious concerns. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This omission hinders both public understanding and the ability of the competent authority to grasp the full extent of the social risks that have been identified through the developer's research.

Residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are not merely speculative. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, there is an evident perception that the proposal threatens community identity and cohesion, with the developer's own findings highlighting a risk of "cultural loss." Despite this, the impacts have not been adequately integrated into the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency critically undermines the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, especially where community character and functioning could be jeopardised. Without the complete dataset, the application fails to provide an adequate evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must enhance positive health outcomes and mitigate harm; yet the available evidence points to existing adverse effects that remain undisclosed. The absence of the complete assessment makes it impossible to demonstrate compliance with this policy.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission represents a critical flaw within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in its assessment of construction and pollution risks, which ultimately hampers the ability to thoroughly evaluate potential environmental effects. While the project entails substantial seabed preparation and installation activities in a challenging high-energy Atlantic environment, it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on vague mitigation and contingency measures that are to be developed only after consent is granted, obstructing any meaningful assessment of their adequacy and effectiveness.

This reliance on undefined future strategies raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these issues will be prevented, controlled, or monitored effectively.

Moreover, there is a notable uncertainty surrounding 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 ascertain the extent, duration, or ecological repercussions of these impacts. This

uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the evaluation of whether suitable safeguards are in place to handle pollution events. This creates procedural risk and inhibits the competent authority from assessing the necessary environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards directly conflicts with the mandates of the Environmental Impact Assessment regime. It is crucial to assess likely significant effects and mitigation measures prior to granting consent, and the absence of this information precludes a lawful determination. Additionally, the application does not adequately demonstrate compliance with relevant policy requirements pertaining to environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises several concerns regarding the integrity of its environmental assessments. The assessment of onshore infrastructure is incomplete, failing to consider the full impacts of what is a single integrated project. The offshore turbines and onshore works are linked, yet they are evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic effects.

Significant risks to sensitive habitats are evident. The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a comprehensive impact assessment prevents a thorough understanding of the project's environmental footprint.

Moreover, the application does not adequately address the carbon balance. Disturbing peatland releases stored carbon, which may create a carbon debt that contradicts renewable energy objectives. The proposal has not shown that the overall carbon balance remains beneficial.

In addition, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that

necessary consents or processes have been initiated, raising concerns about deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The separation of offshore and onshore elements leads to a failure in evaluating cumulative effects, meaning that the combined impacts on peatlands, habitats, and communities are not fully understood.

Taken together, these issues indicate a significant evidential gap regarding biodiversity protection and overall environmental impacts. The separation of project components, absence of comprehensive assessment, and lack of evidence on land use impacts render this part of the application incomplete and unreliable, preventing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment of nocturnal wildlife and dark skies is critically lacking, representing a significant omission within the Environmental Impact Assessment. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment of the West Lewis coastline, known for its exceptionally dark skies. This aspect is essential for the area's environmental quality, cultural identity, and tourism value.

There is no evaluation of the effects of this lighting on visual amenity, landscape character, or the experience of residents and visitors, which is particularly concerning given the rising importance of dark skies to tourism sectors, including astro-tourism. The failure to address these impacts indicates a clear gap in the overall landscape and environmental assessment.

Furthermore, the application does not consider the impact on nocturnal wildlife, particularly species sensitive to artificial lighting such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species face disorientation and increased collision risk due to phototaxis, yet the application lacks any lighting impact assessment or phototaxis study to evaluate how aviation lighting might affect them or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would be adversely affected. The

evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4, particularly 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 a fundamental component of the environment.

Overall, the absence of any assessment of 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 criteria for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. It mirrors the significant 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 comes under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is a concerning lack of a comprehensive and reliable evidential basis for the application. Key data is missing, the design envelope remains undefined, and unspecified mitigation measures rely on assumptions rather than concrete plans. Furthermore, vital impact pathways, such as effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have not been addressed. Consequently, the Environmental Impact Assessment is inadequate, failing to elucidate the likely significant effects or residual impacts.

The process surrounding this proposal is also flawed. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for approval.

In addition, the proposal contradicts National Planning Framework 4 by not adequately protecting biodiversity, natural areas, or cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, leaving uncertainties regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain ambiguous and potentially substantial. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidence provided does not meet the threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and complicating any lawful conclusion regarding acceptable impacts.

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

In summary, the application is fundamentally flawed both procedurally and substantively, with significant deficiencies in information, conflicts with policy, and unresolved environmental risks. These factors hinder the ability to make a lawful, evidence-based decision. The competent authority is urged to refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or to invoke regulatory provisions to obtain the missing information.

Additional Comments

Hi,

There is zero proof on how these turbines are net zero.

Given the effort involved in creating the turbines, shipping them, destruction of land and sea floor then they won't always be spinning.

Also what is the daily rate when it's too windy to have them turned off?

How many islanders are being employed?

Can you guarantee the temporary housing village you will leave won't be given to hmo and filled with migrants that the main land doesn't want?

What happens if a peat bog goes on fire?

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: A96394C3

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

Dear Sir/Madam

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

The application lacks an adequate evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of likely significant effects, and the reliance on unspecified mitigation measures means their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive or informed perspective on environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidentiary support.

There are also clear and substantive conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned close to the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to provide a complete, transparent, or trustworthy assessment of the potential environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity undermines the integrity of the assessment, resulting in a scenario where the impacts discussed may not accurately represent the development that will be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental effects involved.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed later hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not fulfil the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully evaluated or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly inadequate, failing to provide a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area constitutes a highly sensitive and biologically active marine system, yet the baseline data presented is incomplete, and

the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

One critical shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to a failure in evaluating the potential impacts of construction-related disturbances, noise, and increased activity. This gap in the assessment undermines any assertions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further weaknesses, as it relies on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate frequent usage of these waters. The neglect to incorporate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty generated by this assessment prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. This development is located 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 application does not demonstrate to the required evidential standard that these species will not be adversely affected.

A fundamental contradiction exists within the application. The developer concludes there are no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is expected. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

The assessment fails to provide adequate evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses are not thoroughly understood.

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

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

The identified deficiencies also represent non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected puts 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 for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community interweave. The application adopts a narrow perspective, viewing heritage as a collection of isolated, static assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active sites of burial and spiritual practice are mischaracterised as static features, with the assessment neglecting their continued use and meaning, as well as the impact that development could have on their setting. This inadequate representation leads to an incomplete understanding of cultural effects and disregards their role in community life.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, as well as the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely omitted from the assessment, which represents a significant lapse. Without the consideration of these factors, one cannot adequately grasp the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement questions the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical procedural failure is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This alone hinders lawful determination.

From a policy standpoint, these inadequacies place the proposal in clear conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The oversight of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a significant departure from policy requirements.

In summary, the failure to consider living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been properly assessed, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the complete Social Impact Assessment raises significant concerns regarding the lawful evaluation of social impacts, health, and wellbeing. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the absence of the full report results in a critical evidential gap. This lack of transparency denies both the public and the

competent authority the ability to fully comprehend the social risks highlighted in the developer's own research.

Residents have already begun to experience measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as shown through direct engagement. These impacts are not speculative; however, the non-disclosure of the comprehensive assessment limits the capacity for proper scrutiny of the findings. As a result, the significance of these social impacts within the decision-making process remains undetermined.

Moreover, the proposal is viewed as a direct threat to the community's identity and cohesion, with concerns over "cultural loss" emerging from the developer's findings. Despite this recognition, the application fails to incorporate these impacts adequately or assign them appropriate weight. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. An extensive understanding of the social, economic, and health impacts is crucial for developments of such magnitude, especially where community character and functioning may be at stake. By omitting the full dataset, the application lacks a comprehensive evidential basis to assess 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. It is imperative for developments to foster positive health outcomes while avoiding harm, yet the evidence available points to existing adverse effects that remain undisclosed. Without access to the complete assessment, it is impossible to confirm compliance with this essential policy.

The implications of these procedural shortcomings are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This oversight constitutes a material omission within the application and fails to meet the evidential requirements dictated by the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This circumstance obstructs a lawful determination and underscores that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not

adequately capture the significant visual changes that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated in the application.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and heritage. These shortcomings impede a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks is lacking in detail needed for a thorough evaluation of likely environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on the preparation of mitigation and contingency measures after consent. This reliance on undefined future actions raises serious concerns, particularly considering the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vulnerable habitats at risk of sediment disturbance and contamination.

The application does acknowledge certain risks, such as sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to provide adequate information on how these risks will be prevented, controlled, or monitored effectively. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty is compounded by potential effects on already identified sensitive marine species and habitats within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures, which further exacerbates the concerns regarding environmental protection. By postponing contingency planning to a post-consent stage, the application limits the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental measures before a decision is made.

From a regulatory standpoint, deferring essential environmental safeguards conflicts with the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; if this information is not available, a lawful determination cannot be achieved. The application also does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application does not adequately assess the impacts on fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic consequences. Off the West Lewis coast, a vibrant marine ecosystem coexists with an active fishing industry, yet the proposal fails to ensure the protection and sustainability of these critical habitats and activities without causing significant disruption.

A notable concern is the assumption that fishing activities can be relocated without repercussions. There is no substantiated evidence provided that alternative fishing grounds are available or can accommodate the added pressure from displaced fishing efforts. This gap in assessment is crucial, as such displacement poses the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a comprehensive and evidence-based analysis limits the understanding of potential impacts on fisheries and the livelihoods dependent on them.

The proposal poses considerable threats to marine species, especially due to the underwater noise created during construction. The prolonged use of high-energy hammer piling is predicted to disturb marine life over extensive distances, notably affecting populations such as the local bottlenose dolphins. The anticipated disturbance to a considerable portion of this dolphin population raises significant alarm, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There exists a clear contradiction within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises critical concerns regarding adherence to the Habitats Regulations, particularly when legal authorisation for anticipated harm is necessary.

Furthermore, the application 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 becomes impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the proposed development can coexist with current marine users or avoid unacceptable adverse effects on marine biodiversity, thus precluding any determination that the proposal aligns with sustainable development principles.

In summary, the deficiencies related to the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies lead to an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes significant onshore infrastructure, yet the assessment of these elements is materially incomplete, failing to consider the full extent of impacts arising from this single integrated project. The onshore works, which encompass

cabling across protected moorland and the construction of a substation near Stornoway, are linked intrinsically to the offshore turbines. However, these components have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

Excavation across areas of deep peat, particularly within Barvas Moor, poses a threat to a significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, which prevents a full understanding of the project's overall environmental footprint. By excluding or deferring the evaluation of onshore impacts, the application inhibits proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; yet, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Concerns also arise regarding significant risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This omission creates a clear evidential gap concerning biodiversity protection. Furthermore, the disturbance of peatland could lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this issue and fails to show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence in the application that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation. From a policy perspective, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an evaluation of dark skies and nocturnal wildlife, which is a serious oversight. The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, creating a significant "wall of light" effect along the western horizon and drastically changing the night-time landscape.

Furthermore, the application does not consider the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the value of dark skies to the area and the growth of tourism sectors like astro-tourism. The neglect of these factors highlights a major flaw in the environmental assessment.

Equally important is the lack of analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any assessment of lighting impacts or studies on phototaxis, meaning it fails to address how aviation lighting may impact these species or contribute to mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been evaluated. The lack of night-time data prevents a full understanding of the ecological impacts.

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

From a policy standpoint, the absence of assessment contradicts National Planning Framework 4 regarding the preservation of natural spaces and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecosystem.

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

SUMMARY

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

Critical gaps exist in the evidential basis provided for determination. There are notable

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

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

The proposal stands in direct opposition to the National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

The proposed development is not appropriate, would be harmful and damaging to the marine environment and habitat

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: 5BDEB13B

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 processes. Concerns arise from a review of the Environmental Impact Assessment Report and accompanying documents that reveal significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful decision. There are critical gaps in environmental data, and the baseline information is both limited and inconsistent, leaving key components of the proposal inadequately defined. The flexible design framework employed obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed view of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not backed by solid evidence.

Moreover, the proposal reveals clear and substantial conflicts with policy. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate the capacity to meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and severely hinder the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal raises additional concerns about landscape capacity, visual impact, and environmental repercussions. The large turbines positioned near the shoreline are of particular concern, as they threaten to dominate the landscape visually and ecologically. In light of the insufficient information provided, the reliance on undefined mitigation measures, and the evident policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. Given these circumstances, it is essential to invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the 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 threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in this application is fundamentally flawed, lacking a comprehensive understanding of the ecological receptors in the West Lewis coastal area. The region is characterised by a sensitive and biologically active marine environment, yet the baseline data provided is insufficient.

The methodologies employed fail to adequately document species presence, behaviour, and habitat utilisation, which in turn affects the reliability of the assessment's conclusions regarding potential impacts.

A significant oversight is noted in the treatment of otters, classified as a European Protected Species. The application does not appropriately recognise or assess their active foraging and movement within coastal zones. This lack of analysis concerning their core foraging areas and behaviour means that the implications of construction-related disturbances, including noise and increased activity, have not been thoroughly examined. Consequently, the assumptions made regarding the absence of significant effects on otters are undermined.

Further shortcomings emerge in the assessment concerning basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, leading to a likely underestimation of their presence in these waters. This approach contrasts unfavourably with established land-based observations that indicate a frequent occurrence of basking sharks. The omission of such data contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects that are based more on assumptions than on solid evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the necessary criteria set out by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been adequately conducted. The introduced uncertainty prevents the elimination of adverse effects beyond a reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, the granting of consent would be unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated along the west coast of the Isle of Lewis, an area recognised for its internationally important seabird

populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A glaring contradiction is present in the application, as the developer claims there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is typically invoked only in instances where significant harm is anticipated. This inconsistency raises serious questions about the assessment's reliability and suggests that the conclusions drawn are not supported by robust evidence. Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The crucial nature of these feeding grounds has not been fully acknowledged, and the reliance on modelling introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and a lack of comprehensive understanding regarding behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk, as 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 assess the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling deficiencies, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle, thereby preventing a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately consider the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are

interconnected. The application adopts a simplistic view of heritage, treating it merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A significant oversight is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are classified as static features, neglecting their continued use and importance as well as the impact that development may have on their surrounding environment. This mischaracterisation leads to an inadequate assessment of cultural effects and overlooks their vital role in community life.

Moreover, the application does not address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are essential to the area's identity and are conspicuously missing from the assessment, which constitutes a significant omission. Without acknowledging these factors, the cultural implications of the development remain poorly understood.

Further issues arise concerning community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot properly fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This single omission prevents a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not offer an adequate basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, which have not been adequately addressed. A Social Impact

Assessment was commissioned by the developer, including engagement with local residents through focus groups. However, the full report has not been made available, leading to a significant evidential gap that hinders both the public's understanding and the competent authority's ability to fully grasp the social risks identified by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, as indicated in available summaries. These effects stem from direct engagement with the community and are therefore based on real experiences rather than speculation. The failure to disclose the complete assessment restricts proper scrutiny of these findings and affects the evaluation of their importance in the decision-making process.

Additionally, the proposal has been viewed as a threat to community identity and cohesion, with a noted risk of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment conceals the true human and social costs associated with the development.

This deficiency in disclosure compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health implications is crucial, especially when community character and functionality may be impacted. The absence of the complete dataset means that the application lacks a comprehensive evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing negative effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential requirements established by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of pre-existing adverse effects, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts presented in the application is significantly lacking and does not capture the true extent of the changes or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contributes to a profound sense of remoteness. The proposed large-scale turbines situated near the shore would introduce a persistent and overwhelming industrial presence, which would fundamentally change this character and lead to a lasting and irreversible alteration of the landscape.

Furthermore, the application fails to adequately depict the extent of this visual change. Due to their size and proximity, the turbines would dominate sightlines from residential areas, historical locations, and popular coastal sites, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the choice and representation of visual viewpoints. There is evidence indicating that the selected viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This introduces a potential risk of underestimating the magnitude of the visual impact, which calls into question the reliability of the assessment.

Additionally, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context interlinked through visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural importance.

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

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

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

In summary, the assessment does not accurately represent the true scale of the 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 inconsistent with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The evaluation of the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or mitigate

unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal aligns with sustainable development.

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a proposed project that lacks a complete assessment of onshore infrastructure, failing to account for the full spectrum of impacts related to an integrated system. The offshore turbines and onshore works are interlinked, yet they have been evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic ramifications.

The onshore aspects encompass cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive environment. The application does not present a thorough evaluation of these impacts, which impedes a complete understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively. However, the disjointed analysis of offshore and onshore elements results in an incomplete comprehension of the combined effects on peatlands, habitats, and communities.

Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments that are safeguarded by policy. The application fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns also arise in relation to carbon balance, as the disturbance of peatland can release stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy advancement. The application does not sufficiently address this concern or establish that the overall carbon balance is advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been commenced, leading to uncertainties regarding deliverability and lawful execution.

From a policy standpoint, the failure to evaluate the project in its entirety and

demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of assessment regarding dark skies and nocturnal wildlife represents a critical flaw within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would create a visible and intrusive "wall of light" across the western horizon, risks fundamentally transforming the night-time environment.

Moreover, the proposal 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 region's identity and the growing tourism sectors, including astro-tourism. Consequently, there is a substantial gap in the overall landscape and environmental assessment due to these omissions.

A more pressing concern is the lack of evaluation regarding impacts on nocturnal wildlife. Numerous species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are known to be highly sensitive to artificial lighting. Such exposure can lead to disorientation and an increased risk of collision, yet the application does not incorporate any assessment of lighting impacts or a phototaxis study. The failure to consider how aviation lighting may affect these species or increase mortality is a significant oversight.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Other species, such as Kittiwakes, that may forage or migrate at night are also at risk of disorientation due to artificial lighting, yet this has not been properly assessed. The absence of site-specific night-time data creates a serious gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with the National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. This deficiency also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for a lawful determination.

SUMMARY

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

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent. The necessary evidential threshold to affirm the absence of adverse effects beyond

reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and thereby precluding a lawful determination that impacts are acceptable.

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

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

Additional Comments

The impact it will have on the beauty of our coastlines is devastating. We live on our island for its beauty, remoteness and heritage. We will lose all of this and it will have a negative impact on health.

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: 6A2363CA

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The considerable scale, proximity, and design of the proposal lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis required for a lawful decision. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, complicating the assessment of likely significant effects. The flexible design framework further obscures understanding, and the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the proposal presents clear and substantive conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is no demonstration that the national requirements to protect biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts challenge the statutory tests for consent and jeopardise the ability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further alarm, as large turbines are planned to be situated close to the shoreline, raising significant issues relating to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

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 application fails to meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies undermine the ornithological assessment, casting doubt on the

reliability of its conclusions. The presence of contradictory findings raises questions, particularly given that a Habitats Regulations derogation case is only necessary where significant harm is anticipated. This inconsistency suggests that the assessment does not provide adequate support for its conclusions.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Critical foraging areas and migratory pathways are located within the development site, yet the assessment fails to robustly evaluate the potential implications of displacement, collision risk, or habitat loss. Furthermore, the assessment does not adequately address the importance of feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline.

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

These 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 remain unaffected places the proposal in direct conflict with national policy.

Taken together, the shortcomings in the assessment—marked by internal inconsistency, methodological weaknesses, and insufficient evidence—prevent a thorough evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in support of consent.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment is a significant oversight that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the lack of transparency surrounding the complete report creates a substantial evidential gap. This deficiency not only inhibits the public's understanding of the risks identified but also restricts the competent authority's ability to perform a thorough evaluation of the proposal.

Summaries that are available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are grounded in direct engagement with the community

and are not speculative in nature. However, without access to the full assessment, the findings cannot be adequately scrutinised, thereby limiting the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet these critical impacts have not been sufficiently incorporated into the main application or given the necessary weight. The decision to withhold the complete Social Impact Assessment obscures the true human and social cost associated with the development.

The lack of transparency has a detrimental effect on the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The omission of the full dataset means that the application lacks a complete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence presented suggests existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with these policy objectives cannot be affirmed.

The implications of this procedural inadequacy are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This situation constitutes a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation ultimately obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the seascape, landscape, and visual impacts related to the proposed development is significantly lacking and does not adequately represent the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would result in a continuous and imposing industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Additionally, the application fails to accurately depict the magnitude of the visual

changes anticipated. The scale and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would directly impact visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts within the context of such a sensitive landscape.

There are also serious methodological issues with the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the reliability of the assessment.

Moreover, there is a notable deficiency in the assessment's consideration of the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, which is visually and spatially connected to the Atlantic horizon. The assessment treats these assets in isolation, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

Finally, it is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation measures.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately

address the ecological or socio-economic impacts of the proposed development. It lacks a robust evaluation and fails to demonstrate how these vital habitats and activities can be protected or maintained without significant disruption.

A crucial concern is the flawed assumption that fishing activities can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from displacement. This oversight is critical, as the risk of overfishing in other areas may threaten the local fleet's livelihoods. A clear, evidence-based assessment is necessary to understand the implications for fisheries and the associated economic conditions.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling for extended periods is expected to create disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application minimises these impacts without adequate evidence.

There exists an inconsistency within the application, wherein the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the assessment's credibility and raises significant concerns regarding adherence to the Habitats Regulations, especially when potential harm necessitates legal authorisation.

Furthermore, the assessment inadequately considers 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 for determining 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 substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding its sustainability.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant concern. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in sectors like astro-tourism. The proposed

installation of permanent red aviation lighting, visible across long distances, would create an intrusive “wall of light” effect that fundamentally alters the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly troubling given the importance of dark skies to the area’s identity. Furthermore, there is no assessment of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting, which can disorient them and increase their risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and related mortality risks remain unexamined.

This shortfall is exacerbated by the use of daytime survey data in the ornithological assessment, which overlooks nocturnal activities and their associated dangers. Species like Kittiwakes, known to forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data presents a critical gap in understanding the ecological implications of the proposal.

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

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the need to protect natural places and uphold environmental quality. Moreover, they compromise the overall evaluation of landscape and seascape impacts, as night-time character is an essential component of the environment.

Overall, the absence of an assessment focused on dark skies and nocturnal wildlife represents a substantial evidential deficiency. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The assessment regarding tourism impacts is seriously lacking, as it does not address the economic and social repercussions for a vital sector of the Isle of Lewis economy. The local tourism industry relies heavily on the area’s wild coastline, nearly untouched landscapes, dark skies, and the feeling of seclusion. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience. Without this critical analysis, it remains uncertain whether the proposed development would provide a net economic advantage or hinder an established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in bolstering tourism. It fails to recognise how unspoiled landscapes and dark skies enhance visitor experiences, particularly in growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leading to a substantial gap in understanding the effects on a crucial and evolving aspect of the local economy.

In an island community that has limited economic diversification, the neglect of tourism impact assessments carries broader implications for employment, local businesses, and community sustainability. The absence of an adequate Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and consider the economic dependencies of the island culminates in a significant evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and

tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

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

Additional Comments

I was born and brought up on the Isle of Lewis. I grew up watching fish farms first work sustainably and bring welcome employment to the community right on my doorstep. Then they got greedy. They doubled, then tripled, then quadrupled the size of the site in the sea loch. The environment couldn't handle this and the fish got sick, the local

ecosystem irrevocably damaged. Nothing is done to scale to benefit a community any more. It's done on a national level to hit targets and make huge profits for rich executives that never see the impact of what they are building. Put up several turbines to power the Island communities and let us be self sufficient in this way. Do not ruin our landscape and our ecosystem with this atrocity.

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: 84379FE2

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental, given the scale, proximity, and design of the project.

Critical environmental data is missing, and baseline information is limited and inconsistent, leading to significant deficiencies in the Environmental Impact Assessment Report and supporting documentation. The application fails to provide a robust evidential basis for a lawful determination, as key aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of likely significant effects, and reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects.

There are clear and substantive policy conflicts, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate the capability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the competent authority's ability to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are positioned in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must apply.

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 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 is fundamentally inadequate and fails to provide a complete or trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity; however, the baseline data is insufficient, and the methodologies used do not adequately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess the active utilisation of coastal areas by otters for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts of construction disturbance, noise, and increased activity. This

oversight undermines any assertions regarding the absence of significant effects on this species.

Additional concerns arise concerning the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to result in an underestimation of the species' presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

The limitations in methodology mean that assertions of negligible or non-significant effects are grounded in assumptions rather than in robust evidence. The lack of sufficient baseline data further complicates the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and their habitats.

From a regulatory standpoint, the application does not conform to the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The introduction of uncertainty prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. In light of 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 thorough evaluation of impacts on marine ecology and protected species, ultimately contributing to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns regarding the reliability of its ornithological assessment, which is marked by notable gaps in evidence and inconsistencies. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will not be adversely affected by the proposed development. The turbines are positioned within critical foraging areas and migratory routes, yet the assessment fails to sufficiently evaluate the risks associated with displacement, collision, and habitat loss.

A critical inconsistency exists in the application, as the developer asserts that there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack the necessary evidential support. Furthermore, the assessment does

not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used may underestimate potential mortality rates, especially in light of incomplete baseline data and an insufficient understanding of species behaviour.

The placement of turbines within a recognized migratory corridor presents additional significant risks, effectively forming a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential standard needed to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

Moreover, the identified deficiencies signify a failure to adhere to the National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected puts the proposal at odds with national policy.

In summary, the assessment is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity fails to acknowledge this relationship and adopts a reductive view, treating heritage merely as isolated, static assets. This approach neglects their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. The assessment, however, erroneously categorises them as static features, overlooking their continued use and the development's impact on their surroundings. This mischaracterisation results in an incomplete evaluation of the cultural effects and disregards the sites' importance to community life.

Moreover, the assessment does not consider intangible cultural heritage, including the

Gaelic language and traditions, which are integral to the area's identity. The failure to include these elements represents a substantial omission that impedes a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles regarding participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment contravenes the statutory requirement set out in the Islands (Scotland) Act 2018. Without this crucial assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination.

These shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the living cultural practices of the community, constitutes a clear deviation from policy requirements.

Ultimately, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The application does not adequately address the cultural impacts of the development, providing an insufficient basis for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap. This lack of transparency prevents both the public and the competent authority from understanding the extent of the social risks identified in the developer's research. Summaries indicate that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. Nonetheless, the failure to disclose the full assessment hinders proper scrutiny of these findings and limits the ability to assess their significance in the decision-making process.

The proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning

may be affected. Without the full dataset, the application does not provide a comprehensive basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet available evidence shows existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy cannot be established.

The procedural implications are critical. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and 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, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently convey the extent of change or the vulnerability of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic views, unspoiled nature, and a profound sense of isolation. The proposed introduction of large-scale turbines near the shoreline would establish a continuous and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

This application fails to adequately depict the scale of the expected visual transformation. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. Such alterations would directly affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the severity of this impact or its importance in the context of a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been underestimated, thereby compromising the credibility of the assessment.

Moreover, a critical oversight is the lack of analysis regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape context connected through visual and spatial relationships with the

Atlantic horizon. The assessment views these as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are perceived and disturbing their link to the natural horizon. This signifies not only a visual impact but also a wider cultural and spatial detriment that has not been thoroughly evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the preservation of natural environments and historic assets. The degree of change is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a rigorous worst-case evaluation further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Thus, the ensuing change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposed project involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures to be created after consent. This approach prevents any meaningful assessment of whether these measures will be adequate or effective.

The West Lewis coastline, which is home to clean coastal waters and vulnerable habitats, is particularly sensitive to sediment disturbance and contamination. Although the application acknowledges the risks of sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to potential effects on sensitive marine species and habitats noted in the broader assessment.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning until after consent means that there is no evaluation of whether suitable safeguards are in place to deal with pollution events. This introduces procedural risks and hinders the competent authority's ability to assess environmental protection measures during the determination process.

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

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts leads to a materially deficient assessment. These shortcomings obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents a number of significant deficiencies that hinder a reliable evaluation of its impacts on marine life and fisheries. A key concern is the application's inadequate assessment of fisheries and marine life, which fails to provide a thorough evaluation of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these habitats and uses can be safeguarded from substantial disruption.

There is a troubling assumption within the application regarding the displacement of fishing activities. It suggests that this can occur without any adverse consequences, yet there is no evidence to support the availability or accessibility of alternative fishing grounds capable of handling the added pressure. This is a serious omission, as such displacement could lead to overfishing in other areas, potentially resulting in significant economic repercussions for the local fishing fleet. Without a clear and evidence-based assessment, understanding the effects on fisheries and local livelihoods becomes impossible.

Additionally, the proposal raises alarming risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb marine life across wide areas, including vulnerable species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is deeply concerning, yet the application minimizes the significance of these effects without adequate supporting evidence.

The application exhibits a notable inconsistency: while it acknowledges the necessity of

licences for harm to European Protected Species, it simultaneously asserts that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Moreover, the assessment does not account for cumulative impacts that could arise from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which is essential for concluding that the project represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines. However, the assessment of the onshore components is incomplete and does not reflect the full range of impacts from this integrated project. The offshore and onshore elements are considered separately, leading to a fragmented view that obscures the overall environmental and socio-economic consequences.

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

The separation of offshore and onshore assessments prevents an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. However, due to the current approach, the cumulative impacts on peatlands, habitats, and local communities remain unclear.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not provide sufficient evidence that the effects on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been put in place, indicating a significant gap in terms of biodiversity protection.

Concerns are also raised about carbon balance. The disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts renewable energy goals. The application does not sufficiently address this concern or prove that the overall carbon balance is advantageous.

Moreover, routing infrastructure through active croft land may create conflicts with existing land use and legal rights. The application fails to show that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and legal compliance.

From a policy standpoint, the lack of a comprehensive assessment and the failure to demonstrate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that adverse impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient in its failure to evaluate the impacts of dark skies and nocturnal wildlife. The exceptionally dark skies of the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting would create a pervasive "wall of light" effect across the western horizon, fundamentally changing the night-time landscape.

Significantly, the assessment neglects to examine how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the increasing significance of dark skies to the local identity and emerging tourism sectors like astro-tourism. Consequently, the absence of these considerations represents a considerable shortfall in the overall environmental evaluation.

Moreover, there is no appraisal of the lighting's effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, leading to disorientation and higher collision risks. The lack of a lighting impact assessment or a phototaxis study means that the application fails to address potential threats to these species and the possibility of increased mortality.

This shortcoming is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal behaviours or associated risks. Kittiwakes, which may engage in foraging or migration at night, are also susceptible to disorientation from artificial lighting, yet this has not been evaluated. The

absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4, which relates to the safeguarding of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In conclusion, the significant gap in evidential support arising from the absence of assessments concerning dark skies and nocturnal wildlife leaves the application incomplete and incapable of receiving lawful approval.

TOURISM

The assessment of the economic impacts on tourism is significantly inadequate, neglecting to analyse the repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, their behaviours, or the overall economic contributions they make.

Tourism has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not address how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such evaluation, it is impossible to ascertain whether the proposed development would provide a net economic advantage or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in fostering tourism, notably the significance of unspoiled landscapes and dark skies to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable void in understanding the impacts on a recognised and expanding facet of the local economy.

In a context where the island community has limited economic diversification, the neglect to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a valid Island Communities Impact Assessment means that these economic vulnerabilities have not been

examined as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to prove net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and fails to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, examining environmental factors influencing visitor behaviour, and recognising the island's economic dependencies lead to a considerable evidential gap. This undermines a thorough evaluation of the economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential benchmarks. The concerns raised echo those from the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, this application arrives under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the application's evidential reliability. The use of an undefined design envelope and unspecified mitigation measures, alongside omissions regarding nocturnal wildlife impacts, the full scope of onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. As a result, it fails to provide a comprehensive understanding of likely significant effects or any residual impacts.

Procedural failures further weaken the proposal. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a material omission that obstructs the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly contradicts National Planning Framework 4, as it does not effectively demonstrate protection of biodiversity, natural places, and cultural heritage. It falls short in showing that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts from both offshore and onshore components have not been adequately assessed, thereby obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related

to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but, in some instances, internally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

Considering these factors, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, hampers the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or activate relevant regulatory provisions to mandate the submission of the missing information.

In conclusion, 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 feel the turbines are too big & too close to shore

The island infrastructure isn't built to cope with influx of people required to build this project.

There are many environmental risks the project is going to cause, polluting the skies at day & night with lighting, polluting the waters around the turbines & releasing carbon from peatlands will all have negative effects.

I don't feel the community benefit on offer are anywhere near sufficient for the loss of the natural beauty of our islands being destroyed. Loss of income to local business from tourism will also be affected.

Although local company's will benefit short term whilst the project is being built, long term all maintenance contracts will be sub contracted to mainland firms with little or no jobs for local people.

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: F38B2336

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is set to be located off the west side of the Isle of Lewis, a region renowned for its Atlantic-facing coastline, nearly untouched natural environment, and deep-rooted cultural identity. Concerns regarding the scale, proximity, and design of this development raise serious questions about its alignment with statutory requirements, national policies, and the core principles of sustainable development.

The application itself lacks an adequate evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is scarce and inconsistent, and several key facets of the proposal are still not clearly defined. Moreover, the use of a flexible design framework obscures the understanding of potential significant impacts, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community repercussions, leaving unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with established policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and public health. It does not successfully illustrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts fundamentally challenge the statutory tests necessary for consent and compromise the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses additional concerns, with large turbines planned in close proximity to the shoreline, raising serious issues about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and compromises the integrity of the Environmental Impact Assessment Report. This approach undermines the ability to apply a consistent worst-case scenario, leading to potential discrepancies between the presented impacts and those of the actual development. As a result, both the public and the competent authority are unable to comprehend the true extent of the environmental effects.

Furthermore, the application is heavily contingent upon mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that environmental harm would be addressed only at a later stage, hindering any thorough evaluation of effectiveness or residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable, contravening the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

In addition, the assessment is fraught with evidential deficiencies, including notable gaps in baseline data and limitations in methodology, while relying on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to 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, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

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

foundation necessary for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding the reliability of the ornithological assessment, which is riddled with substantial gaps in evidence and internal contradictions that fundamentally undermine its conclusions. The site is situated on the west coast of the Isle of Lewis, an area known to support internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate, to the requisite evidential standard, that these species will remain unaffected. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to thoroughly evaluate the

implications of habitat loss, collision risk, and displacement.

Moreover, a critical inconsistency is evident in the application; the developer asserts that there will be 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 credibility of the assessment, suggesting that its conclusions are not substantiated by the evidence provided. The assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully acknowledged, and reliance on modelling methods introduces further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially where baseline data is incomplete and the behavioural responses of the birds remain poorly understood.

Placing turbines within a recognised migratory corridor adds another layer of significant risk, potentially creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of ongoing mortality in this corridor, along with the potential impact on species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, impeding any lawful conclusions that could support consent.

The identified deficiencies also demonstrate a lack of compliance with National Planning Framework 4, particularly concerning biodiversity protection and the conservation of natural assets. The inability to convincingly show that internationally significant seabird populations will not be adversely affected positions the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These issues hinder a thorough evaluation of potential impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for a favourable decision.

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.

CONSTRUCTION AND POLLUTION RISKS

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

Given the sensitivity of the receiving environment, this dependence on undefined future measures raises significant concerns. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The proposed application for development fails to provide a comprehensive assessment of fisheries and marine life, which is critical for understanding ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a

diverse marine ecosystem and a thriving fishing industry; however, the submission does not adequately demonstrate how these vital uses and habitats can be preserved or sustained without significant disruption.

A fundamental concern arises from the assumption that fishing activities can be relocated without negative consequences. The application does not furnish any evidence that alternative fishing grounds exist, are accessible, or can accommodate increased pressure. This gap in information is critical, as such displacement could lead to overfishing in other areas, with potentially serious economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based analysis means that the repercussions for fisheries and livelihoods remain unclear.

Additionally, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over a prolonged period is likely to disturb species over considerable distances, with particular concern for dolphins. The predicted disruption to a significant segment of the local bottlenose dolphin population raises alarming issues, yet the application tends to minimise the importance of these effects, lacking adequate supporting evidence.

The application exhibits a notable inconsistency; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious compliance issues with the Habitats Regulations, especially when harm is foreseen to a degree that necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential, as it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions without it.

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

In conclusion, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the presence of internal inconsistencies lead to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough evaluation of the onshore infrastructure, which is critical as it forms part of a singular integrated project alongside the offshore

turbines. By assessing these components separately, the proposal adopts a fragmented approach, obscuring the true extent of the environmental and socio-economic repercussions. This is particularly concerning given the onshore elements, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access routes through delicate landscapes. These activities involve excavation through deep peat areas, especially within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. As a result, the application does not deliver a complete assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and local communities remain largely unexamined. Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these vital habitats have been fully assessed or that appropriate measures to avoid harm have been implemented, creating a significant gap in the evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, potentially leading to a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not adequately tackle this concern or provide assurance that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with current land use and legal rights. The lack of evidence confirming that the required consents or processes have been initiated casts doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and demonstrate adequate protections for peatlands, habitats, and land use interests contravenes both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Ultimately, the separation of the project components, the absence of a comprehensive assessment, and the lack of evidential support regarding environmental and land use impacts culminate in an incomplete and unreliable submission, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal presents a significant evidential gap due to the absence of assessments concerning dark skies and nocturnal wildlife, which are crucial components of the Environmental Impact Assessment. The exceptionally dark skies of the West Lewis coastline contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the

western horizon. This alteration of the night-time environment raises concerns regarding visual amenity, landscape character, and the experiences of residents and visitors.

Furthermore, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The application notably lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting may impact these vulnerable species or potentially raise mortality rates.

The shortcomings are exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate during the night, are similarly at risk of disorientation due to artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates an essential gap in understanding the ecological impacts of the proposal.

As a result, it is impossible to ascertain whether protected species or designated sites would be adversely affected without a thorough assessment of nocturnal impacts. The application fails to meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and preventing a lawful determination.

In terms of policy, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall ecological setting.

In summary, the absence of any assessment focused on dark skies and nocturnal wildlife reveals significant flaws in the application. The lack of baseline data, impact modelling, and species-specific analysis renders it incomplete, thus incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It brings to light the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a major concern. This new application is presented under an even stronger policy framework, which now emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for the proposal, marked by critical gaps in baseline data and the ongoing use of an undefined design envelope. The

reliance on unspecified mitigation measures is concerning, as is the omission of key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts of the development.

Procedurally, the application demonstrates clear shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage and fails to demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further undermines claims of net economic benefit. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks associated with the proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

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

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

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

Additional Comments

I strongly feel that the environmental impacts of this development outweigh any benefits. In particular to our marine mammals and the wider marine environment.

Many of our seabirds and our precious marine life is already threatened already and this development will be of further detriment, by affecting feeding grounds and migration routes.

Furthermore the industrialisation of this rare and pristine environment amounts to a crime, both during constructive and afterwards when this environment is forever destroyed with a lasting visual impact.

The profits benefit a multinational company with little benefit to the local economy when local people lose their income derived from low impact tourism and marine activities.

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: 75D53EB2

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental consideration, cultural impact, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not furnish an adequate evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain unspecified. The application's flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their efficacy unassessable. Consequently, the documents fail to provide a comprehensive or informed insight into the environmental, cultural, or community implications, and claims of negligible or non-significant effects lack robust evidential support.

There are evident and substantial conflicts with policy. The proposal appears to diverge from the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability from a policy perspective.

The magnitude of the proposal is unprecedented for this area, with large turbines situated in close proximity to the shore, raising significant issues related to landscape capacity, visual dominance, and environmental ramifications. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrates that the application is incomplete and fails to support a lawful determination. In light of these concerns, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application raises significant concerns regarding its reliability due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. It fails to demonstrate, to the required evidential standard, that

internationally important seabird populations, many of which are already in decline, will not be adversely affected. The west coast of the Isle of Lewis supports these critical seabird populations, and the development is situated within key foraging areas and migratory pathways. However, the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. It adopts a simplistic view of heritage, treating it as a collection of isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community. This reductive approach undermines the true nature of these assets.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These sites remain active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to consider how development impacts their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Moreover, the application neglects to assess intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These vital elements form the identity of the area but are absent from the assessment, highlighting a significant omission. Without addressing these factors, the cultural impact of the proposed development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to align with established principles of participation regarding cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to meet its legal obligations in evaluating the social, cultural, and economic impacts on the island community. The lack of this assessment alone hinders a lawful determination.

From a policy standpoint, these deficiencies create a 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 and to recognise living cultural practices illustrates a clear departure from policy requirements.

Collectively, the oversight in assessing 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 properly evaluated, and the application lacks a sufficient foundation for assessing the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development fails to provide an adequate assessment of seascape, landscape, and visual impacts, which undermines the true scale of change and sensitivity of the environment in question. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The installation of large-scale turbines in close proximity to the shoreline would lead to a significant industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately convey the extent of visual change that would occur. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This serious level of impact has not been properly represented within the assessment, particularly given the sensitivity of the landscape.

There are also significant methodological issues concerning the choice and presentation of visual viewpoints. It appears that the selected viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises concerns that the true scale of visual impact may be understated, which in turn compromises the reliability of the assessment.

Moreover, the application neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the surrounding landscape, with visual and spatial relationships to the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, leading to an incomplete understanding of the impact on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not only a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4, which emphasises the importance of safeguarding natural environments and historical assets. The scale of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any assertions of policy conformity.

Ultimately, the identified impacts are not amenable to effective mitigation. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The change would thus be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment falls short in accurately portraying the scale of impact, the

sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal does not align with the need to protect this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, leaving critical details lacking for evaluating the likely environmental effects. Substantial seabed preparation and installation works will take place within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially alarming, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and potential accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application restricts the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation need to be assessed prior to consent, and when such information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application's assessment of fisheries and marine life is inadequate and lacks a thorough evaluation of ecological and socio-economic impacts. The West Lewis coast is home to both a diverse marine ecosystem and an active fishing industry, yet the proposal fails to adequately demonstrate that these essential uses and habitats can be safeguarded without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be relocated without negative repercussions. The application offers no proof that alternative fishing grounds exist, are accessible, or can sustain increased fishing pressures. This significant oversight poses the risk of overfishing in other areas, potentially leading to broader economic impacts on the local fishing fleet. In the absence of a clear, evidence-based evaluation, the implications for fisheries and livelihoods remain unclear.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise created during construction. Prolonged high-energy hammer piling is expected to disturb marine life across extensive areas, impacting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without sufficient corroborating evidence.

There is a notable contradiction within the application that acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This inconsistency undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm warrants legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not demonstrate 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 avoid unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with the principles of sustainable development.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal significantly fails to meet the requirements for sustainable development, as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues identified in the previous 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current proposal is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential foundation necessary for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, depends on unspecified mitigation measures, and fails to address essential impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Moreover, clear procedural lapses are present. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements outlined in the Islands (Scotland) Act 2018, and the failure to provide 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.

This proposal directly contradicts the principles established in National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. The application fails to show acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain ambiguous and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in several areas. The evidential threshold to conclusively exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In light of these considerations, the application is fundamentally unfit for determination both procedurally and substantively. The multitude of informational deficiencies, policy inconsistencies, and unresolved environmental risks prevent a lawful and evidence-

based decision. Therefore, the competent authority must refuse consent based on these grounds or invoke the relevant regulatory measures to obtain the necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F4E39F34

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the project question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been established that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects and mean the competent authority cannot make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is known for its sensitivity and biological activity. However, the baseline data provided is incomplete, and the methodologies

employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to establish a reliable evidential basis for evaluating potential impacts.

A notable gap in the assessment concerns otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of the potential impacts from construction activities, noise, and increased human presence. Such inadequacies undermine the conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly in the Atlantic's unique conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that reveal frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline, which in turn undermines the reliability of the conclusions.

These methodological issues mean that any conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful evaluations of cumulative and indirect impacts, including seasonal variations and interactions within the broader ecosystem. This uncertainty raises concerns regarding the true extent of risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty introduced impedes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents 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 West Lewis coastline embodies a rich cultural landscape where the environment, language, tradition, and community are deeply intertwined. The assessment of cultural heritage and community identity is fundamentally inadequate, as it treats heritage merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are

particularly overlooked. These sites serve as active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the implications of development on their setting results in an incomplete evaluation of cultural effects, neglecting their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and traditions, as well as the long-standing relationship between the community and the coastal environment, is not assessed. These elements are essential to the area's identity and their absence represents a significant omission. Without this consideration, it becomes impossible to properly understand the cultural impact of the proposed development.

Concerns extend to community rights and engagement, particularly given that the Gaelic-speaking population holds a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a Free, Prior and Informed Consent process undermines the assessment's legitimacy, failing to uphold established principles of participation in decisions that affect cultural and environmental interests.

Compounding these issues is the critical procedural failure regarding the absence of a compliant Island Communities Impact Assessment, 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, rendering any determination unlawful.

From a policy standpoint, these deficiencies put the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, marks a clear deviation from policy requirements.

Overall, the failure to properly assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently explored. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, which is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connections to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case assessment calls into question any claims of policy compliance.

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

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The Environmental Impact Assessment fails to evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. The significance of dark skies to the region's identity and to emerging tourism sectors, such

as astro-tourism, makes this omission particularly troubling. The gap in the overall assessment of the landscape and environment is clear.

Moreover, there is no analysis of how the lighting will affect nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide a lighting impact assessment or a phototaxis study, meaning it neglects to consider how aviation lighting could impact these species or lead to higher mortality rates.

The assessment further relies on daytime survey data, which fails to capture nocturnal activity or associated risks. Kittiwakes, which might forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, there is a critical lack of understanding regarding ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to determine if protected species or designated sites would be adversely affected. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt cannot be met, thus engaging the precautionary principle and hindering 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 detracts from the overall evaluation of landscape and seascape impacts, as night-time character is an essential aspect of the environment.

In summary, the absence of any assessment regarding dark skies and nocturnal wildlife presents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and 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 as outlined in statutory duties, national policy, and evidential standards. It revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data undermine the reliability of the application, which relies on an undefined design envelope and unspecified mitigation measures. Additionally, key impact pathways have been overlooked, including nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failures are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty under the Islands (Scotland) Act 2018. Furthermore, the incomplete disclosure of the Social Impact Assessment constitutes a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, lacking evidence of biodiversity protection, natural places, and cultural heritage preservation. It also does not demonstrate that health and wellbeing impacts are acceptable or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and barring a lawful conclusion that the 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, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent effects that cannot be satisfactorily mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder the capacity for a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

These are the reasons that I object to the N4 Spiorad na Mara project. I therefore hope the views of islanders on this matter is heard and respected.

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: 75C4778A

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns have been raised about the proposal's scale, design, and proximity, particularly with respect to its compliance with statutory obligations, national policy, and sustainable development principles.

The application is deficient in providing a sufficient evidential foundation necessary for a lawful decision. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain unspecified. The reliance on a flexible design framework obscures the understanding of potential significant effects, and the proposed mitigation measures, which have not yet been defined, prevent any assessment of their effectiveness. Consequently, the documentation fails to furnish a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are significant policy inconsistencies associated with the proposal. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests necessary for consent and impede the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented in this area, with large turbines being positioned very close to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental consequences. In conclusion, the combination of insufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy guidelines indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the application of the precautionary principle is warranted.

ASSESSMENT OF ALTERNATIVES

The proposal lacks a comprehensive and evidence-based evaluation of alternative options, which is essential under the Environmental Impact Assessment requirements. Instead of offering a logical comparison of feasible alternatives based on their environmental consequences, the application outlines the project's development history without demonstrating that less harmful options have been adequately considered or chosen over more damaging ones.

There is a notable absence of a transparent analysis of different offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely contemplated placing turbines further from the shore, where the potential for visual, ecological, and coastal impacts could be diminished. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impacts, this lack of analysis prevents any assertion that the proposed location is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, with insufficient evidence indicating that alternative paths have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The failure to present a clear strategy for avoidance and the lack of comparative analysis signal that mitigation through design has not been prioritised, instead relying on post-design mitigation strategies.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This situation reflects a neglect of the established mitigation hierarchy, preventing the competent authority from determining whether more suitable and less harmful alternatives are available. In the absence of a thorough alternatives assessment, it cannot be determined that the proposal aligns with sustainable or policy-compliant practices.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and the well-being of communities. The failure to provide a structured and comparative assessment is a significant omission, reinforcing the conclusion that the application has not undergone adequate evaluation and cannot support a lawful decision.

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's commissioning of a Social Impact Assessment, which included focus groups with local residents, has resulted in a significant evidential gap due to the non-publication of the full report. This lack of transparency impedes both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research. Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and should not be considered speculative. However, the omission

of the complete assessment restricts scrutiny of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal appears to pose a direct threat to community identity and cohesion, as evidenced by the developer's acknowledgment of "cultural loss." Despite this recognition, these social impacts have not been adequately incorporated into the main application or given sufficient weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for projects of this scale, particularly those that may affect community character and functioning.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential that developments support positive health outcomes and mitigate harm. However, the existing evidence indicates adverse effects that have not been fully communicated. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

The implications of these procedural oversights are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hinders lawful determination and underscores the inadequacy of the information supporting the application.

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks related to construction and pollution is lacking and does not include the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation activities in a high-energy Atlantic setting, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be prepared after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependence on unspecified future measures raises particular concerns, especially considering the sensitivity of the environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it lacks adequate information on how these issues will be prevented, controlled, or monitored.

There is also ambiguity about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the demands of the Environmental Impact Assessment regime. It is necessary to evaluate likely significant effects and mitigation before consent, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to show compliance with policy requirements concerning environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial 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, which represents a material omission. The proposal includes the introduction of permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the region's identity and the potential growth of sectors such as astro-tourism. This gap in the overall landscape and environmental assessment is substantial.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to consider how aviation lighting may affect these species or

contribute to mortality rates.

This oversight is further aggravated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, could also be disoriented by artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the broader assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall landscape.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means that the application remains incomplete and cannot support a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm signifies a profound failure to meet the criteria for sustainable development in light of statutory obligations, national policy, and evidential standards. It revisits 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 is now submitted under a more robust policy framework that places heightened emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The submission lacks a comprehensive and reliable evidential foundation necessary for a proper determination. Notable gaps exist in baseline data, the continued reliance on an unspecified design envelope, unclarified mitigation measures, and a failure to address significant impact pathways, including nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Procedurally, there are evident failures present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact

Assessment represents a critical omission. Such deficiencies hinder the competent authority's ability to evaluate effects 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 illustrate adequate protection of biodiversity, natural areas, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and does not demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly evaluated, thus obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

There remains a degree of uncertainty regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in places. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

Taken collectively, the application is both procedurally and substantively inadequate for determination. The extent of informational deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke appropriate regulatory measures to mandate the submission of the required information.

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

Additional Comments

I have only visited Lewis once but was amazed how beautiful it was. Building a wind farm would spoil the beauty of the Island dramatically.

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: DFED93D9

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, which may not align with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There is missing critical environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The flexible design framework used in the application obscures the understanding of likely significant effects, and without specified mitigation measures, it is impossible to evaluate their effectiveness. Consequently, the documentation does not allow for a complete or informed assessment of environmental, cultural, or community impacts, and claims of negligible effects are unsubstantiated.

There are significant policy conflicts present. The proposal seems to contradict 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 demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests needed for consent and hinder the competent authority's ability to determine if the development is acceptable under policy guidelines.

The proposal's scale is unprecedented for this area, with large turbines situated near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of inadequate information, reliance on unspecified mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report demonstrates substantial deficiencies, failing to deliver a comprehensive, transparent, and trustworthy evaluation of the anticipated environmental impacts associated with the proposal. Notably, the absence of specific turbine dimensions, layouts, or configurations due to the reliance on a

flexible Project Design Envelope creates considerable uncertainty. This lack of clarity undermines the assessment's integrity, leading to the potential that the impacts delineated may not accurately mirror the eventual development, thus obstructing both public and competent authority comprehension of the true nature of environmental effects.

Consent for the application is predicated on the assumption that environmental harm will be addressed through unspecified mitigation measures, monitoring strategies, and management plans, which remain undefined. This approach defers critical information to stages following consent, rendering it impossible to evaluate the effectiveness or assess residual impacts meaningfully. Such deferral contravenes the Environmental Impact Assessment framework's intent, which mandates that significant effects and mitigation be clearly established prior to determination.

The report further reveals considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Consequently, this engenders uncertainty concerning the magnitude and significance of impacts, especially in instances where findings of negligible or non-significant effects are presented without adequate supporting data. This insufficiency obstructs a thorough understanding of cumulative and worst-case impacts, while introducing scientific uncertainties that stand in conflict with statutory obligations.

As a direct result of these inadequacies, the application fails to satisfy the evidential standard stipulated under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus invoked, particularly regarding protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively assessed or that appropriate safeguards exist.

Collectively, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies preclude a lawful and rigorous appraisal of environmental effects, thereby placing the competent authority in a position where it cannot make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to provide a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, there is a lack of sound evidential basis

for evaluating potential impacts.

A significant oversight in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This neglect extends to their core foraging range and behavioural patterns, resulting in an inadequate evaluation of the potential effects related to construction disturbance, noise, and increased activity. Such oversights compromise the conclusions drawn regarding the absence of significant effects on this species.

Moreover, the assessment of basking sharks is deficient, with a reliance on aerial surveys that introduces considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and significantly undermines the reliability of the conclusions reached.

The limitations in methodology lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This creates uncertainty regarding the true risks posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed and exhibits considerable gaps in evidence and internal inconsistencies that detract from its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. There is a failure to robustly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer claims that there are no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the assessment's reliability and indicates that the conclusions presented lack adequate support from the underlying evidence.

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

The siting of turbines within a recognised migratory corridor adds another significant risk, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species that have 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 data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and precludes a lawful conclusion supporting consent.

Overall, 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 impacted puts the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately contributing to the conclusion that the application does not meet the statutory requirements necessary for 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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposal is fundamentally lacking and does not adequately capture the degree of change or the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a significant industrial presence, fundamentally altering this character and causing a

permanent transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would not only affect visual amenity but also diminish the essential qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact, failing to consider the sensitivity of the landscape adequately.

Concerns arise from the methods used to select and present visual viewpoints. Evidence indicates that the chosen viewpoints may overlook the most sensitive receptors and fail to depict worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This risks underestimating the visual impact, which compromises the credibility of the assessment.

Another significant oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked visually and spatially to the Atlantic horizon. By treating these assets as isolated, the assessment neglects their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and disconnecting them from the natural horizon. This represents not just a visual impact but also a cultural and spatial harm that the application fails to assess properly.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the preservation of natural landscapes and historical assets. The proposed scale of change does not align with the requirements to protect landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case scenario assessment undermines claims of policy compliance.

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 overwhelming and unavoidable. Consequently, the anticipated change is not something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

The assessment of construction and pollution risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. The application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills but does not supply sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures compounds these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the point of determination. From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and in the absence of this information, a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts render the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented in the application regarding fisheries and marine life is notably inadequate, lacking a thorough evaluation of the ecological and socio-economic impacts involved. The marine environment off the West Lewis coast is home to a rich array of marine species and supports a vibrant fishing industry. However, the application does not convincingly demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A critical concern is the assumption made that fishing activities can be displaced without resulting consequences. There is no substantiated evidence provided to suggest that alternative fishing grounds are available or accessible, nor that they could sustain the increased pressure from displaced fishing activities. This significant omission raises the potential for overfishing in other areas, which may yield broader economic repercussions for the local fishing fleet. Consequently, without a transparent and evidence-supported evaluation, the 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 activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, including populations of dolphins. The expected disturbance to a considerable segment of the local bottlenose dolphin population prompts serious concern, yet the application minimizes the importance of these effects without sufficient backing evidence.

In addition, there exists a clear inconsistency within the application where the necessity for licenses to permit harm to European Protected Species is recognised, whilst simultaneously asserting that the impacts are negligible. This contradiction calls into question the credibility of the assessment and raises significant concerns regarding adherence to the Habitats Regulations, especially where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to adequately address the cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activity. In the absence of a comprehensive evaluation of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus hindering any determination that the proposal embodies sustainable development.

Ultimately, the lack of evidence concerning the displacement of fishing activities, the underestimation of acoustic impacts, and the internal inconsistencies of the application culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the implications for marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment for this proposal fails to address critical aspects regarding dark skies and nocturnal wildlife, representing a significant omission.

The West Lewis coastline is noted for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism value. However, the introduction of permanent red aviation lighting, which is visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application lacks an evaluation of the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and the emerging astro-tourism sector. The absence of such an assessment indicates a clear gap in the landscape and environmental evaluation.

Moreover, the assessment does not consider the impacts on nocturnal wildlife, including sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are affected by artificial lighting due to phototaxis. This can lead to disorientation and increased risks of collision. The application does not include any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species and potentially increase mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects nocturnal activity and its associated risks. Kittiwakes, for example, may forage or migrate at night and are similarly susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy perspective, these omissions conflict with the National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. This gap in assessment also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the broader ecological framework.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife creates a significant evidential shortfall. The lack of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and inadequate for supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by

statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds

or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 99C1A260

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, with baseline information being limited and inconsistent. Key elements of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a thorough understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a living cultural landscape where environment, language, tradition, and community are intricately linked. The assessment of cultural heritage and community identity fails to recognise this connection, adopting a reductive view that treats heritage merely as a collection of static assets. It neglects to acknowledge the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

Cemeteries at Dalmore, Bragar, and Barvas are examples of culturally significant sites that are active places of burial and spiritual practice. However, the assessment inaccurately categorises them as static features, overlooking their continued use and meaning while failing to consider the impact of development on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to align with established principles of participation in cultural and environmental decisions.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination of the proposal unlawful.

These shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices signifies a clear departure from policy requirements.

Ultimately, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The 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 assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

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

heritage. These shortcomings hinder a reliable evaluation and reinforce the determination that the proposal is incompatible with the protection of this landscape.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a profound failure to comply with the principles of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application revisits core issues that previously led to the refusal of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Notably, it is now presented within a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis necessary for determination. The application fails to present complete baseline data and continues to rely on an undefined design envelope. Furthermore, it depends on unspecified mitigation measures and neglects significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the entire Social Impact Assessment is a material omission. These flaws obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding 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, the disruption of cultural and visual relationships, and the impacts on tourism represent permanent effects that cannot be mitigated to an acceptable

level.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. Therefore, 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.

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 horrified that this is even being considered! When the energy won't even benefit the islands!

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: FE025B79

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, with baseline information being limited and inconsistent. Key elements of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a thorough understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or trustworthy depiction of the likely environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity hinders the ability to consistently apply a worst-case scenario, compromising the assessment's integrity. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, limiting both the public's and the competent authority's capacity to grasp the full extent of environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later precludes any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation measures be clearly established prior to determination.

Moreover, there are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

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

Collectively, the dependence 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 deficiencies obstruct a lawful and robust assessment of environmental effects and result in the competent authority being unable to determine the application based on the provided information.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that

the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide adequate assurance that these species will not be adversely affected, particularly given that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The current assessment of cultural heritage and community identity is deeply flawed and does not recognise the West Lewis coastline as a vibrant cultural landscape. Here, the environment, language, tradition, and community are inextricably linked. Instead of appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the

application reduces it to mere isolated and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, but the assessment inaccurately categorises them as static features, neglecting their ongoing use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to a failure in evaluating the cultural effects and overlooks their importance in community life.

Moreover, the assessment neglects intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These components are vital to the area's identity yet are completely omitted from consideration, creating a substantial gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity associated with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, making this omission a barrier to lawful determination.

From a policy standpoint, the identified deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. Ignoring both tangible and intangible heritage, along with failing to acknowledge 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 obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately addressed, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents; however, the complete report has not been published. This significant evidential gap limits both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's research. The absence of the full assessment not only inhibits proper scrutiny of the findings but also

restricts the determination of the significance of these impacts within the decision-making process.

Summaries of the assessment suggest that residents are currently experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are therefore not speculative. Additionally, there is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with findings from the developer indicating a risk of “cultural loss.” Yet, these impacts have not been adequately integrated into the main application nor given appropriate consideration.

The withholding of the full Social Impact Assessment obscures the true human and social costs of the proposed development, undermining the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health impacts for developments of this scale, especially where community character may be affected. By failing to provide the complete dataset, the application does not present a thorough evidential basis to assess the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and avoid harm, yet the available evidence points to existing adverse effects that have not been fully revealed. Without the full assessment, it is impossible to establish compliance with this policy.

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

Overall, the non-disclosure of the full Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts, landscape, and seascape is seriously lacking. It does not accurately reflect the significant changes and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed large-scale turbines would create a constant industrial presence near the shore, which would fundamentally change this character and lead to an irreversible transformation of the landscape.

The application fails to properly illustrate the scale of the visual change that would

occur. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the level of this impact or its significance in relation to such a sensitive landscape.

Concerns arise regarding how visual viewpoints were selected and presented. Evidence indicates that some viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially for key cultural heritage sites and important landscapes. This raises the possibility that the visual impact has been understated, which undermines the reliability of the assessment.

Another shortcoming is the lack of evaluation of how landscape, seascape, and cultural heritage are interconnected. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially connected to the Atlantic horizon. The assessment treats these as separate entities rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections and change how heritage assets are experienced, altering their relationship with the natural horizon. This represents not just a visual impact, but also a broader cultural and spatial harm that has not been adequately examined in the application.

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

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

Overall, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks raises significant concerns regarding its ability to adequately evaluate potential environmental effects. The proposed works, which entail considerable seabed preparation and installation within a dynamic Atlantic environment, lack fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the

application suggests relying on mitigation and contingency measures that would be formulated after consent has been granted. This approach undermines any thorough assessment of the proposed measures' adequacy or effectiveness.

The sensitivity of the receiving environment further exacerbates these issues. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on preventative, control, or monitoring strategies.

Moreover, there is considerable 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 consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats, which have been identified as sensitive in the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address potential pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferment of essential environmental safeguards conflicts with the requirements stipulated by the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to granting consent; when this information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of comprehensive management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment concerning dark skies and nocturnal wildlife represents a significant omission in the Environmental Impact Assessment. The West Lewis coastline features exceptionally dark skies, which are vital to the environmental quality, cultural identity, and tourism value of the area. The proposed project includes permanent red aviation lighting that will be visible over considerable distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon, which would fundamentally alter the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. This is particularly concerning given the critical role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. The absence of such evaluations reveals a significant gap in the overall landscape and environmental assessment.

Equally important is the lack of analysis regarding the impacts on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are especially sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased risks of collision. The application does not contain a lighting impact assessment or a phototaxis study, thus neglecting to consider how aviation lighting could impact these species or heighten mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Species such as Kittiwakes, which may engage in foraging or migration at night, are also at risk of disorientation from artificial lighting; however, this risk remains unassessed. The absence of site-specific data related to night-time activity creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4, particularly regarding the protection 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 integral element of the overall environment.

In summary, the complete lack of assessment pertaining to dark skies and nocturnal wildlife constitutes a considerable evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents significant shortcomings that undermine sustainable development, failing to meet the necessary statutory duties and national policy requirements. The project mirrors the core issues of the 2008 Lewis Wind Power proposal, which was previously denied due to unacceptable levels of industrialisation. Despite being submitted under an updated policy framework that emphasises biodiversity, peatland conservation, landscape preservation, and community wellbeing, the proposal still falls short.

Critical gaps in the evidence base are evident, particularly concerning baseline data and the reliance on an undefined design envelope. The proposal includes unspecified mitigation measures and omits key impacts such as those on nocturnal wildlife, the full extent of onshore infrastructure, and potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of significant effects or residual impacts.

Moreover, procedural deficiencies abound. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the non-disclosure of a full Social Impact Assessment constitutes a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with National Planning Framework 4, lacking evidence of biodiversity protection, safeguarding natural areas and cultural heritage, and failing to demonstrate acceptable health and wellbeing impacts. It does not provide any proof of net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The application does not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal is set to cause extensive and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with the negative repercussions on tourism, represent permanent effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or mandate the submission of the necessary 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: A384A650

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. It is based on a review of the Environmental Impact Assessment Report and related documents, 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 and cultural identity. Concerns arise from the scale, proximity, and design of the project, which question its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is inconsistent and limited, and crucial elements of the proposal are not clearly defined. The flexible design framework employed does not provide clarity on likely significant effects, while unspecified mitigation measures hinder the assessment of their effectiveness. Consequently, the available documentation does not allow for a comprehensive understanding of the potential impacts on the environment, culture, or community, and claims regarding negligible or non-significant effects lack robust evidence.

There are evident and serious conflicts with policy. The proposal contradicts the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and public health. It does not sufficiently demonstrate that it can meet national requirements to safeguard biodiversity and environmental integrity. These inconsistencies directly challenge the statutory tests for consent and weaken the ability of the relevant authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the project raises significant issues, as large turbines will be placed near the shoreline. This introduces serious concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report contains substantial deficiencies and does not deliver a comprehensive, clear, or dependable account of the potential environmental effects stemming from the proposal. A critical issue arises from the employment of a flexible Project Design Envelope, which lacks commitment to specific

turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. Consequently, the impacts detailed may not accurately reflect the development ultimately built, thus obscuring the true extent of environmental effects from both the public and the competent authority.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns due to the inadequacy of the assessment of alternatives, which fails to comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project development that does not adequately demonstrate that less harmful options have been properly identified and evaluated in favour of more damaging solutions.

There is a glaring lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly show that the developer has genuinely considered positioning the turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely increase. Considering the sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, the failure to conduct such an analysis means that it cannot be concluded that the proposed siting is the least damaging alternative.

The shortcomings are further evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been implemented. Instead, the application relies heavily on post-design mitigation measures.

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

From a policy standpoint, this significant deficiency undermines adherence to the National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a critical omission that leads to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not provide a thorough understanding of the ecological receptors involved. This marine system is biologically active and sensitive, yet the baseline data presented is incomplete, and the methodologies used fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The assessment neglects to consider their core foraging ranges and behavioural patterns, which means the possible effects of construction disturbances, noise, and heightened activity have not been properly evaluated. This lack of attention undermines the findings concerning the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from notable deficiencies, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than sound evidence. The insufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies undermine the ornithological assessment, casting doubt on the reliability of its conclusions. The presence of contradictory findings raises questions, particularly given that a Habitats Regulations derogation case is only necessary where significant harm is anticipated. This inconsistency suggests that the assessment does not provide adequate support for its conclusions.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Critical foraging areas and migratory pathways are located within the development site, yet the assessment fails to robustly evaluate the potential implications of displacement, collision risk, or habitat loss. Furthermore, the assessment does not adequately address the importance of feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in

severe decline.

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

These 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 remain unaffected places the proposal in direct conflict with national policy.

Taken together, the shortcomings in the assessment—marked by internal inconsistency, methodological weaknesses, and insufficient evidence—prevent a thorough evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in support of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. It adopts a simplistic view of heritage, treating it as a collection of isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community. This reductive approach undermines the true nature of these assets.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These sites remain active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to consider how development impacts their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Moreover, the application neglects to assess intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These vital elements form the identity of the area but are absent from the assessment, highlighting a significant omission. Without addressing these factors, the cultural impact of the proposed development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the legitimacy of the

assessment and fails to align with established principles of participation regarding cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to meet its legal obligations in evaluating the social, cultural, and economic impacts on the island community. The lack of this assessment alone hinders a lawful determination.

From a policy standpoint, these deficiencies create a 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 and to recognise living cultural practices illustrates a clear departure from policy requirements.

Collectively, the oversight in assessing 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 properly evaluated, and the application lacks a sufficient foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally lacking, with insufficient transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the complete report has not been made public. This represents a considerable evidential gap that hinders both public understanding and the competent authority's ability to assess the full scope of social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently facing significant stress, anxiety, and concern due to the proposal's scale and proximity. These consequences arise from direct community engagement and are thus grounded in reality rather than speculation. However, the absence of the full assessment restricts proper examination of these findings and limits the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" identified within the developer's own findings. Despite this, these social impacts have not been adequately included in the main application or given the necessary weight in considerations. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. It is critical to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, especially when community character

and functioning may be at risk. The failure to provide the full dataset means that the application does not present a complete evidential basis necessary for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development must not only support positive health outcomes but also avoid causing harm; however, the available evidence points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly lacking. It does not capture the extent of change or the sensitivity of the environment surrounding the West Lewis coastline. This area is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and causing a permanent transformation of the landscape.

The application fails to represent the extent of visual change accurately. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would impact visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. It appears that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the scale of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of acknowledging their

interdependence, the assessment treats these as separate entities, leading to an incomplete analysis of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The scale of change is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises significant concerns regarding the incomplete assessment of construction and pollution risks, which fails to provide adequate detail for evaluating potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application places reliance on mitigation and contingency measures that are to be prepared post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially troubling considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Further compounding these issues is the uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have already been

identified as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant concerns regarding the assessment of fisheries and marine life, which is insufficient and lacks a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be protected or maintained without causing substantial disruption.

A critical issue arises from the assumption that fishing activity can be displaced without consequence. The application fails to provide any evidence that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This omission is particularly concerning, as displacement may lead to overfishing in other areas and could have wider economic ramifications for the local fishing fleet. Without a clear and evidence-based assessment, it is impossible to fully understand the impacts on fisheries and livelihoods.

Furthermore, the proposal poses considerable risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling, which would occur over an extended period, is likely to cause disturbances over large distances, potentially impacting species like dolphins. The predicted disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the importance of these effects without sufficient supporting evidence.

There is also an evident inconsistency within the application, acknowledging the need

for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises alarm about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application proposes significant onshore infrastructure related to an integrated project involving offshore turbines and associated works. However, the assessment of the onshore elements is materially incomplete, failing to consider the full extent of impacts. The onshore works encompass cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As a result, the application does not provide a thorough evaluation of the environmental footprint, preventing a complete understanding of the project's impacts.

The separation of the onshore and offshore components leads to a fragmented approach, which obscures the true scale of environmental and socio-economic effects. This lack of a comprehensive assessment also hinders the ability to evaluate cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the current assessment fails to integrate the combined effects on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The proposal does not adequately demonstrate that impacts on these habitats have been fully assessed, nor does it show that appropriate avoidance measures are in place. This raises a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the disturbance of peatland, which releases stored carbon and potentially creates a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a cohesive whole and the inability to demonstrate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. This further undermines the application, as it does not show that impacts can be avoided or mitigated.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, the impacts on nocturnal wildlife are not addressed. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application lacks any assessment of lighting impacts or studies on phototaxis, meaning it does not evaluate how aviation lighting could affect these species or contribute to mortality rates.

This issue is compounded by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and their associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at

risk of disorientation from artificial lighting, yet this has not been investigated. The absence of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

Without proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may face adverse impacts. The required evidential standard to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, invoking the precautionary principle and hindering a lawful determination.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it lacks a solid evidential foundation.

There are significant gaps in the baseline data presented, an undefined design envelope, unverified mitigation measures, and missing assessments of key impact areas such as nocturnal wildlife, onshore infrastructure, and tourism effects. The Environmental Impact Assessment is thus incomplete, failing to provide a thorough understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to submit a complete Social Impact Assessment is a serious omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact analysis. The cumulative effects of

both offshore and onshore components have not been thoroughly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential burden required to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively inadequate for determination. The extensive deficiencies in information, along with policy contradictions and unresolved environmental risks, preclude a lawful and evidence-based decision. It is essential for the competent authority to either reject the consent application on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary information.

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

Additional Comments

we are right off the sure this makes not only a problem for the wildlife but the marine life that migrates through our shores and also even having this energy up none of it would go towards the island or our lives either we are the ones getting impacted by this

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D1A65F13

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. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed significant material deficiencies related to planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

Crucially, the application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The application employs a flexible design framework that obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and serious policy conflicts. The proposal 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. It does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent, undermining the ability of the competent authority to deem the development acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a reliable account of the potential environmental effects of the proposed project. The approach of employing a flexible Project Design Envelope, which does not commit to precise turbine sizes, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the predicted impacts may not accurately reflect the development as it will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that any environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. This deferral of essential information to stages post-consent is procedurally unacceptable and runs counter to the intentions of the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly identified prior to determination.

There are also substantial evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These issues yield uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if adequate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data result in the Environmental Impact Assessment Report being both unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of alternatives within the application is materially inadequate and does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on

their environmental effects, the application merely recounts the project's evolution. This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened.

These deficiencies also extend to the evaluation of cable routing and landfall assessment, as there is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the insufficient comparative analysis highlight that mitigation by design has not been effectively utilised, leading to an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors present. This region is recognised as a biologically active and sensitive marine system, yet the baseline data provided is insufficient, and the methodologies employed do not adequately capture species presence, behaviours, and habitat usage. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

The assessment's shortcomings are particularly evident regarding otters, a species protected under European law. The application does not appropriately recognise or evaluate their usage of coastal areas for foraging and movement. This oversight neglects to account for their core foraging ranges and behavioural patterns, resulting in a failure to adequately assess the impacts of construction disturbances, noise, and

increased human activity. Such omissions undermine any claims concerning the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from methodological deficiencies, primarily due to its reliance on aerial surveys that carry significant detection biases, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The disregard for such data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological flaws imply that the assertions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of comprehensive baseline data hinders any meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This leaves uncertainties regarding the true extent of risks posed to marine species and habitats.

Regulatory requirements, including those set forth by the Environmental Impact Assessment regime and National Planning Framework 4, are not adequately met in the application, as it has not properly identified or assessed protected species. The uncertainties introduced necessitate the application of the precautionary principle, as it prevents the reasonable exclusion of adverse effects. Thus, consent cannot be lawfully granted under these circumstances.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions culminates in an unreliable assessment. These critical deficiencies inhibit a thorough evaluation of the potential impacts on marine ecology and protected species and substantiate the overall assertion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a significant risk due to the siting of turbines within a recognised migratory corridor, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term implications of sustained mortality within this corridor, as well as insufficient evaluation of the potential effects on species with relatively small global populations.

Moreover, the ornithological assessment reveals substantial flaws, including significant gaps in evidence and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis hosts 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 to the requisite evidential standard. It fails to robustly evaluate the implications of displacement, collision risk, or habitat loss, particularly concerning seabirds associated with protected sites like the Lewis Peatlands and St Kilda.

A fundamental contradiction exists within the application, as the developer asserts no significant adverse effects while also advancing a Habitats Regulations derogation case. Such a case is only necessary when significant harm is expected, thus raising serious questions about the reliability of the assessment. The reliance on modelling approaches introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars, and the methodologies used are likely to underestimate mortality where baseline data is incomplete and behavioural responses are not fully understood.

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

Furthermore, the identified deficiencies indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and safeguarding 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, preventing a robust evaluation of impacts and leading to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal fails to adequately assess community rights and engagement, particularly concerning the Gaelic-speaking population, which embodies the characteristics of an Indigenous People. The absence of a Free, Prior and Informed Consent process significantly undermines the legitimacy of the assessment, ignoring established principles of participation essential for decisions impacting cultural and environmental interests.

Moreover, there is a critical procedural oversight in the lack of a compliant Island Communities Impact Assessment, a statutory requirement as stipulated by the Islands (Scotland) Act 2018. This deficiency hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic implications for the island community, thereby preventing a lawful determination of the proposal.

The cultural heritage assessment is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are closely interlinked. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating cultural assets as isolated and static entities.

Additionally, the treatment of culturally significant sites, such as the cemeteries at

Dalmore, Bragar, and Barvas, is inadequate. These sites serve as active places for burial and spiritual practices but are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, resulting in an incomplete evaluation of cultural impacts and disregarding their significance in community life.

Intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's historical relationship with the coastal environment, is also overlooked. These elements are integral to the identity of the area but are entirely absent from the assessment, creating a significant gap in understanding the cultural impact of the development.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the lack of recognition for living cultural practices, signifies a clear deviation from policy requirements.

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development remain inadequately addressed, and the application does not furnish a sound basis for evaluating the actual cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking in transparency and fails to provide a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report remains unpublished. This creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete social risks outlined in the developer's own research.

Summaries that are available suggest that residents are experiencing stress, anxiety, and concern due to the proposal's scale and proximity. These effects are based on direct engagement, making them factual rather than speculative. Yet, without access to the entire assessment, proper scrutiny of these findings is impossible, limiting the ability to judge their significance in the decision-making process.

Evidence also indicates that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Nevertheless, these impacts have not been adequately included in the main application or given the necessary consideration. The lack of a full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is

crucial for developments of this nature, especially when community character and functioning may be at stake. The failure to provide the complete dataset means that the application lacks a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid negative impacts; however, the available information points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The procedural implications 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 substantial omission within the application and a failure to satisfy the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This obstructs a lawful determination and reinforces the conclusion that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and does not accurately capture the extent of the changes or the sensitivity of the environment that would be affected. The character of the West Lewis coastline is distinguished by an unspoiled Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The introduction of large-scale turbines near the shore would lead to a continuous industrial presence, which would irrevocably transform this character.

Inadequacies in the application extend to its representation of the scale of visual change. The size and placement of the turbines would overshadow views from residential neighbourhoods, historic sites, and popular coastal areas. This would have a direct adverse effect on visual amenity and undermine the intrinsic qualities of naturalness and remoteness. The assessment fails to convey the full significance of this impact in light of the sensitivity of the landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence indicating that the viewpoints chosen may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly with respect to important cultural heritage locations and high-value landscapes. Such shortcomings raise the risk that the actual visual impacts have been understated, which compromises the overall reliability of the assessment.

Another notable deficiency is the lack of evaluation of the interconnectedness between

seascape, landscape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets as isolated entities instead of acknowledging their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these vital relationships, altering the context in which heritage assets are perceived and breaking their link to the natural horizon. This constitutes not only a visual impact but also a more extensive cultural and spatial detriment that the application does not sufficiently assess.

From a policy standpoint, the proposal is directly at odds with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of the changes proposed is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case impact assessment further weakens any assertions of compliance with policy requirements.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Consequently, the resulting change is inherent and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately depict the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and substantiate the conclusion that the proposal is incompatible with the conservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate, lacking the detail necessary to evaluate potential environmental effects. The proposal entails considerable seabed preparation and installation works in a high-energy Atlantic environment. However, the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful evaluation of their effectiveness or sufficiency.

This reliance on unspecified future measures is especially troubling given the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

There is uncertainty regarding the scale and behaviour of sediment plumes that may

result from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are in place to address pollution incidents. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to granting consent, and if this information is absent, 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 result in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposed development's impact on fisheries and marine life is severely lacking, leading to significant concerns about ecological and socio-economic consequences. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not adequately demonstrate how these vital resources can be safeguarded without causing major disruptions.

A critical flaw in the application is the assumption that fishing activities can simply be displaced without any repercussions. There is no evidence presented to suggest that alternative fishing grounds exist or that they could support the additional pressure created by such displacement. This gap is crucial, as it poses risks of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and the livelihoods they support remain inadequately understood.

The proposal also raises significant risks for marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to cause disturbances across extensive areas, adversely affecting species such as dolphins. The application downplays the potential impact on a significant proportion of the local bottlenose dolphin population, raising serious concerns, yet it lacks sufficient evidence to support these minimal

assessments.

Moreover, there is an evident inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the reliability of the assessment and raises questions about adherence to the Habitats Regulations, especially when harm is expected to the extent that it requires legal permission.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal aligns with sustainable development.

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions found within the application collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally incomplete, as it does not account for the full range of impacts resulting from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is significant; however, these components have been evaluated separately. This fragmented approach obscures the comprehensive environmental and socio-economic effects that arise from the project.

Onshore activities entail the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. The excavation activities are particularly concerning as they traverse areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these onshore impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively. Yet, the division between the offshore and onshore elements means that the combined impacts on

peatlands, habitats, and local communities remain inadequately explored. Furthermore, there are significant risks to sensitive habitats, including machair systems and peatland environments, which are recognised as deserving policy protection. The application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, revealing a substantial gap in evidence concerning biodiversity protection.

The proposal also raises serious issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the principles of renewable energy development. The application does not sufficiently address this concern or provide assurance that the overall carbon balance will remain advantageous.

Moreover, the routing of infrastructure through active croft land poses possible conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, prompting doubts about the project's feasibility and legal compliance. From a policy standpoint, the failure to assess the project in its entirety, while also not demonstrating adequate protection of peatlands, habitats, and land use interests, is at odds with both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the disjointed assessment of project components, the absence of thorough evaluations, and the lack of evidence regarding environmental and land use impacts result in a part of the application that is incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would create a continuous and intrusive wall of light across the western horizon. This change would fundamentally alter the night-time environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important given the value of dark skies to local identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application fails to evaluate the effects on nocturnal wildlife, which is a significant oversight. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species and their mortality rates are not addressed.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk from disorientation caused by artificial lighting, yet this has not been assessed. Without site-specific night-time data, understanding the ecological impacts is severely limited.

The lack of an assessment for nocturnal impacts makes it impossible to determine whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents a lawful determination.

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

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

TOURISM

The assessment of tourism impacts associated with the proposed development is severely inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and its sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Since 2017, tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Despite this significant increase, the application does not model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the evaluation neglects to take into account the essential role of environmental quality in sustaining tourism, including the critical importance of unspoiled landscapes and dark skies to enhance visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies

Assessment further exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and expanding part of the local economy.

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

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependencies results in a considerable evidential void. This deficiency hampers a comprehensive evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious failure to meet the principles of sustainable development as required by statutory duties and national policy. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which was rejected due to its unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

Significant gaps exist in the evidential foundation necessary for proper determination. The use of an undefined design envelope is problematic, and there is a reliance on unspecified mitigation measures. Notably, the application overlooks critical impact pathways, including those affecting nocturnal wildlife, the complete scope of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment falls short, hindering a comprehensive understanding of likely significant effects and residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the absence of a full Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal also directly contradicts National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural environments, and cultural

heritage. It does not provide evidence that health and wellbeing impacts are acceptable nor does it establish a net economic benefit, as it lacks tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm proposal be entirely refused.

Additional Comments

I am so shocked at the chance attall of this going ahead.
We can only guess the terrible impact,even at best.
If no one lived in these islands,be bad for the animals and all wildlife on land and sea.
There is a substantial population of people though,we are here for peace quiet and tranquility,and feel in a safe environment for now.
Please put a stop to this now.

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: 9B37D4F8

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 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 application fails to meet the statutory requirements of the Environmental Impact Assessment regime, primarily due to an inadequate assessment of alternatives. Instead of presenting a structured and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has thoroughly considered the possibility of positioning turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in evaluating impact, means that the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately 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 comparative analysis indicates that mitigation by design has not been implemented, with a reliance instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through the processes of site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy and limits the competent authority's ability to ascertain whether there are less harmful and more appropriate alternatives available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency raises concerns regarding compliance with National Planning Framework 4, particularly in relation to the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that further supports the overall conclusion that the application has not been adequately evaluated and cannot lead to a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a biologically active and highly sensitive marine system. However, the assessment of marine ecology and protected species presents significant deficiencies that undermine its reliability. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species within this critical area. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a species that is protected under European law. The application has not sufficiently recognised or assessed their use of coastal areas for foraging and movement. There is a notable lack of consideration given to their core foraging range and behavioural patterns, which means that the potential impacts from construction disturbances, noise, and increased activity have not been adequately

evaluated. This gap in understanding compromises the conclusions regarding the absence of significant effects on this protected species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys that introduce considerable detection bias in challenging Atlantic conditions. This approach is likely to underestimate the presence of basking sharks in these waters, especially when contrasted with established observations from land that indicate their frequent use of the area. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further weakening the reliability of the conclusions drawn.

The methodological flaws present in the assessment mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This creates uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been accurately identified or assessed. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps and inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are within the development site, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a critical contradiction in the application. The developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only applicable where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, indicating that the conclusions drawn are not firmly supported by the evidence.

The assessment lacks sufficient evidence to show that seabirds connected to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. Methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of potential sustained mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling shortcomings, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion supporting consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape that integrates environment, language, tradition, and community. The application takes a narrow view, treating heritage merely as a collection of disconnected, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static features. This oversight neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their importance in community life.

Additionally, the assessment fails to incorporate intangible cultural heritage elements, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. Such aspects are crucial to the area's identity but are completely omitted from the evaluation, which represents a major gap. Without including these factors, the cultural impacts of the development remain inadequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, identifiable as an Indigenous People, yet no Free, Prior and Informed Consent process has taken place. The lack of meaningful engagement compromises the credibility of the assessment and does not align with accepted principles for participation in decisions affecting cultural and environmental interests.

Moreover, 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. The absence of this assessment means the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone hampers a lawful determination.

From a policy standpoint, the deficiencies identified create a direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to assess both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear departure from policy stipulations.

Collectively, the oversight in evaluating living heritage, intangible cultural values, community rights, and legal obligations culminates in a notable evidential gap. The cultural impacts stemming from the development have not been thoroughly examined, and the application falls short of providing an adequate foundation for determining the true cultural costs of the proposal.

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, creating a significant evidential gap. This omission prevents both the public and the competent authority from comprehensively understanding the social risks identified through the developer's own research.

Available summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are not merely speculative. Nevertheless, the lack of disclosure regarding the full assessment limits scrutiny of the findings and the ability to gauge their significance in the decision-making process.

There is also evidence indicating that the proposal poses a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been fully integrated into the main application or adequately considered. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functioning may be affected. The failure to provide the full dataset results in an incomplete 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. Development should promote positive health outcomes and prevent harm, yet the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural implications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts related to the proposed development is significantly lacking, failing to capture the extent of change and the sensitivity of the West Lewis coastline. This coastline is characterised by its open Atlantic horizon and undeveloped nature, which contributes to a strong sense of remoteness. Introducing large-scale turbines near the shoreline would lead to a continuous industrial presence that would dramatically alter this character, resulting in a permanent and irreversible change to the landscape.

The application does not adequately portray the scale of visual change expected from the turbines. Their size and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities of naturalness and remoteness. Furthermore, the assessment fails to effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not fully represent the

most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This raises the possibility that the true magnitude of visual impact has been underestimated, compromising 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 linked to the surrounding landscape through visual and spatial relationships to the Atlantic horizon. The assessment treats these assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would sever these relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This not only constitutes a visual impact but also entails broader cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which emphasises the protection of natural places and historic assets. The anticipated scale of change does not align with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further weakens any claims of compliance with policy.

Moreover, the identified impacts are unlikely to be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. The resulting changes are thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is deficient, lacking the necessary detail to evaluate potential environmental impacts adequately. The proposal entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependency on unspecified future measures raises particular alarm given the

sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these incidents will be prevented, managed, or monitored.

There remains uncertainty regarding the scale and dynamics of sediment plumes that could result from seabed disruption and cable installation. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are established to respond to pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to an assessment that is materially inadequate. These deficiencies inhibit a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a serious shortfall in assessing the impacts on fisheries and marine life, resulting in an incomplete understanding of the ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal fails to provide assurance that these essential uses and habitats will be protected from significant disruption.

One critical concern is the flawed assumption that fishing activities can simply be displaced without negative repercussions. The application does not offer any evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating increased pressure. This lack of information is crucial, as displacing fishing efforts could lead to overfishing in other areas, ultimately affecting the local

fleet's economic viability. Without a thorough, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, especially due to the underwater noise generated by construction activities. Prolonged hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. The projected disturbance to a significant segment of the local bottlenose dolphin population raises alarming issues, yet the application minimises these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly when harm is expected to an extent that requires legal authorisation.

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

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

In summary, the deficiencies related to fishing displacement, underestimation of acoustic impacts, and internal contradictions 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 proposed development lacks a comprehensive assessment of onshore infrastructure, resulting in an incomplete evaluation of the project's impacts. The offshore turbines and the associated onshore works are interconnected; however, their assessment is conducted separately. This fragmented approach obscures the full extent of the environmental and socio-economic consequences of what is essentially a singular integrated project.

The onshore infrastructure includes cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These operations entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive

area. The application fails to provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project should be evaluated collectively. The existing separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This raises serious concerns about biodiversity protection and highlights a significant evidential gap.

The proposal also brings forth issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts renewable energy objectives. The application inadequately addresses this matter and fails to show that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and legal implementation.

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

In summary, the combination of separating project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts renders this section of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive wall of light effect across the western horizon. This will fundamentally change the night-time environment.

The application fails to evaluate how this lighting will impact visual amenity, landscape

character, or the experiences of both residents and visitors. Given the importance of dark skies to the area's identity and the growing sector of astro-tourism, this omission is critical. Not considering these impacts results in a substantial gap in the overall landscape and environmental assessment.

More concerning is the lack of evaluation regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting due to phototaxis, which can disorient them and increase the risk of collision. There is no lighting impact assessment or phototaxis study included in the application, meaning that the potential effects of aviation lighting on these species or mortality rates have not been assessed.

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

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied. This invokes the precautionary principle and hampers the ability to make a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall setting.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife leads to a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis make the application incomplete and unable to support a lawful determination.

TOURISM

Tourism on the Isle of Lewis has seen 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. However, the application does not assess how the proposed large-scale offshore infrastructure could impact tourism, particularly in terms of visitor numbers and economic contributions. It is essential to understand that tourism relies heavily on the area's wild coastline, unspoiled landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of the potential effects on this key sector.

The assessment overlooks the importance of environmental quality for tourism. Unspoiled landscapes and dark skies are vital to visitor experiences, particularly for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impact on this growing part of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. Additionally, the lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate environmental factors affecting visitor behaviour, and address the island's economic dependency leads to a significant evidential gap. This gap prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential criteria. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for determination is lacking in this application. There are notable deficiencies in baseline data, the use of an undefined design envelope, dependence on unspecified mitigation measures, and the exclusion of crucial impact pathways, including those related to nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Furthermore, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a substantial omission. These shortcomings obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4, as it fails to protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential repercussions for peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant risks to the environment. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and, in certain instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I am very concerned on a health aspect in particular. This is uncharted territory and I feel like a "guineapig" in trying something new. These turbines are so close to my home and will be visible from my house.

Presently I enjoy the dark skies at night, pitch black. This will be an eyesore and a blot on the landscape where beauty once reigned.

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: C430BC5D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the project raise serious questions about its adherence to 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, with baseline information being limited and inconsistent, and significant components of the proposal remaining undefined. The flexible design framework used hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the acceptability of the development in policy terms.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of publication of the full Social Impact Assessment commissioned by the developer represents a significant evidential gap. This omission prevents both the public and the competent authority from fully understanding the social risks identified through the developer's own research, hindering proper scrutiny of the findings. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are derived from direct engagement, not speculation, yet the withholding of the full assessment limits the ability to determine their significance within the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given the appropriate weight. The non-disclosure of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this scale, especially when community character and functioning may be affected. Without the full dataset, the application fails to provide a complete evidential basis for assessing the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and avoids harm. However, the available evidence indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a permanent and irreversible alteration of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is

materially deficient, failing to adequately represent the extent of this visual change.

The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. However, the application does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

Moreover, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Rather than recognising their interdependence, the assessment treats these as isolated assets, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently addressed in 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 anticipated scale of change contradicts the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further calls into question any assertion of compliance with policy requirements.

Additionally, it is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, leading to changes that are fundamental and permanent, rather than capable 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 interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project presents significant shortcomings in its assessment of the onshore infrastructure, which is critical to understanding the overall environmental and socio-economic impacts of what is essentially a unified initiative. While the offshore turbines and onshore works are interconnected, the current evaluation treats them separately. This disjointed approach leads to a failure in recognising the full scope of the environmental and socio-economic consequences.

Key elements of the onshore construction include cabling that traverses protected moorland, the establishment of a substation near Stornoway, and the development of access routes through delicate landscapes. Notably, these operations involve digging through areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically valuable habitat. The lack of a thorough assessment of these impacts restricts the understanding of the project's overall environmental footprint.

By deferring or neglecting the evaluation of onshore impacts, the application obstructs a proper consideration of cumulative effects. It is vital that all aspects of a project are assessed collectively, but the isolation of offshore from onshore activities obscures the comprehensive impacts on peatlands, habitats, and local communities.

There is a particular concern regarding the risks posed to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application fails to show that the effects on these habitats have been fully evaluated or that appropriate measures to avoid harm have been implemented, leading to a notable deficiency in terms of biodiversity protection.

Moreover, the proposed routing of the infrastructure through active croft land raises potential issues with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, which casts doubt on the feasibility and legality of the project.

From a policy standpoint, the failure to treat the project as a cohesive whole and to adequately protect peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated further weakens the application.

In summary, the fragmentation of project components, the lack of a thorough assessment, and the insufficient evidence regarding environmental and land use impacts contribute to making this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive “wall of light” effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment only exacerbates the issue, as it does not account for nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data constitutes a serious gap in understanding the potential ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions directly conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as night-time character is an integral part of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria of sustainable development as evaluated against statutory obligations, national policies, and evidential standards. This application echoes the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Presenting it now under a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate these concerns.

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Additionally, clear procedural shortcomings exist. The failure to submit a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a substantial omission. These gaps 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 conflicts directly with National Planning Framework 4. It does not demonstrate effective protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit as it lacks tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, thereby obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion 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, loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism signify permanent effects that cannot be sufficiently mitigated.

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

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

Additional Comments

I am in favour of renewables but not at any cost. We do not need more renewables in Lewis. We do not need to industrialise our island. Few jobs, profit going elsewhere and a patronising community fund. Do not be fooled by jobs argument- this is for profit. It is not for local community. I am frankly appalled by Council support - shameful and short-sighted.

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: FFBF9380

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

Dear Sir/Madam

This letter represents a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment requirements. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly pristine environment, and rich cultural heritage. The dimensions, closeness to the coast, and design of the wind farm present serious questions about its alignment with statutory obligations, national policies, and the tenets of sustainable development.

A primary concern is the lack of adequate evidence supporting a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are not clearly defined. The flexible design framework employed hinders a comprehensive understanding of the likely significant impacts, and the reliance on unspecified mitigation measures precludes a proper evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed overview of potential environmental, cultural, or community consequences, making assertions of negligible or non-significant effects unsubstantiated by strong evidence.

Additionally, there are substantial conflicts with existing policies. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and the National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, safeguard climate interests, or maintain environmental integrity. These discrepancies are critical as they directly impact the statutory tests necessary for granting consent and compromise the ability of the relevant authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines set in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency, leading to an unreliable depiction of the potential environmental consequences of the proposed development. The incorporation of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This aspect obstructs a consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the environmental impacts presented may not accurately represent the final development, hindering both public understanding and the competent authority's capacity to gauge the true extent of the environmental effects.

The application places significant 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 managed later precludes any substantive evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated prior to determination.

Furthermore, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where findings of negligible or non-significant effects are advanced without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

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

In summary, the deficiencies arising from the undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data contribute to an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information submitted.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the connections between environment, tradition, language, and community are deeply intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly compromises the evaluation of social impacts, health, and wellbeing associated with the proposal. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the complete report remains unpublished. This lack of transparency creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge the social risks identified by the developer's own research.

Residents are reported to be experiencing tangible levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are therefore based on concrete evidence rather than speculation. However, without access to the entire assessment, there is limited capacity for scrutiny of these findings, which undermines their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with “cultural loss” explicitly mentioned in the developer’s findings. Nonetheless, these critical impacts have not been sufficiently integrated into the primary application or given adequate consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs tied to the development.

This lack of transparency also detrimentally affects the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health implications is vital, especially when the character and functioning of the community may be jeopardised. By withholding complete data, the application falls short of providing an adequate evidential basis to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development projects are expected to facilitate positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have not been fully revealed. In the absence of the complete assessment, the application cannot affirm compliance with this policy.

The procedural implications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts related to the proposed development is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is marked by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to capture the extent of the visual change that would occur. The size and location of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and depiction of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and areas of high landscape value. Consequently, this raises the possibility that the visual impact has been underestimated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these as isolated features neglects their interdependence and leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and their relation to the natural horizon. This change signifies not only a visual impact but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The degree of change is at odds with the requirement to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further weakens any assertions of policy compliance.

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

Overall, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These inadequacies prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in its assessment of onshore infrastructure, which is critical to understanding the full impact of what is fundamentally an integrated project. The offshore turbines and the associated onshore works are interdependent, yet they have been evaluated separately. This division results in a fragmented analysis that fails to capture the comprehensive environmental and socio-economic repercussions.

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. Notably, the excavation required for these works occurs in areas of deep peat, particularly in Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's environmental footprint.

By postponing or omitting the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the segregation of offshore and onshore components obscures the total impacts on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to adequately demonstrate that the impacts on these habitats have been fully considered or that effective avoidance measures have been applied, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland results in the release of stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project as a whole, alongside the

inability to ensure protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation of impacts further diminishes the reliability of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application lacks a comprehensive assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which contribute greatly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting visible over long distances would create an intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

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

The application also neglects to evaluate the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and heighten collision risks. Without a lighting impact assessment or phototaxis study, the proposal fails to consider how aviation lighting could affect these species or increase mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, may also forage or migrate at night and are susceptible to disorientation caused by artificial lighting. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

In the absence of an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer adverse impacts. 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, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also

diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Overall, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and specific analysis of affected species leaves the application incomplete and unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a profound failure to fulfil the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. The issues that led to the refusal of the Lewis Wind Power proposal in 2008 are echoed in this application, which has been presented under a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A complete and reliable evidential basis for determination is lacking in the application. There are significant gaps in baseline data, alongside the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures and the exclusion of crucial impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of the likely significant effects or residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to provide assurance 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 impact of offshore and onshore elements has not been thoroughly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain respects, inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of 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 necessary regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 09C08151

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a detailed examination of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural heritage, the proposed development raises critical issues regarding its alignment with statutory obligations, national policy, and the fundamental principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful determination. There is a notable absence of essential environmental data, and the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework obstructs a clear comprehension of the likely significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are pronounced and substantive conflicts with 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 habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, address climate considerations, and uphold environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shore, raises substantial concerns about landscape capacity, visual impact, and broader environmental consequences. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, the evidential inadequacies, and the clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable account of the potential environmental impacts of the proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This ambiguity compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect those of the actual development, thus preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the basis that any environmental harm will be addressed later, which obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of vital information to post-consent stages is procedurally unacceptable and undermines the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

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

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is not possible to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the existence of gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to provide a full understanding of the ecological receptors in the West Lewis coastal area. This environment is biologically active and sensitive, yet the data collected is incomplete and the methods used do not effectively capture information about species

presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable basis for evaluating potential impacts.

A significant oversight involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal areas for foraging and movement. This omission, particularly regarding their core foraging range and behaviour, means that the effects of construction disturbance, noise, and increased activity have not been properly assessed. Thus, any claims of negligible effects on this species lack substantiation.

There are also notable shortcomings in the assessment of basking sharks. The reliance on aerial surveys has created significant detection bias, especially under Atlantic conditions. This method likely underreports the presence of basking sharks, especially when compared to established land-based observations that show they frequently utilise these waters. The failure to consider this data leads to an incomplete baseline and diminishes the reliability of the findings presented.

These methodological flaws mean that any conclusions indicating negligible or non-significant effects are based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not comply with 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 uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, ultimately demonstrating that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, featuring significant internal inconsistencies and substantial gaps in evidence that undermine its conclusions. It fails to adequately demonstrate that internationally important seabird populations, many of which are already in decline, will not be adversely affected by the proposed development on the west coast of the Isle of Lewis. This area includes key foraging zones and migratory pathways, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction exists within the application; while the developer asserts that there will be no significant adverse effects, they also pursue a Habitats Regulations

derogation case, which is only relevant where significant harm is anticipated. Such inconsistencies raise serious doubts about the credibility of the assessment and suggest that its conclusions lack the necessary supporting evidence.

The evidence presented is insufficient to assure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species that are experiencing severe decline, like Kittiwakes and Fulmars. Methodologies used in the assessment are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and substantial risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with 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 effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, means the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion in support of consent.

These deficiencies also constitute a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's weaknesses in methodology, evidence, and internal consistency lead to the conclusion that it does not fulfill the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is critically flawed. It fails to acknowledge this area as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application reduces heritage to a series of static assets, neglecting their continuing social, cultural, and spiritual significance for the local community.

A notable shortcoming in the assessment pertains to culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual significance; however, the application inaccurately categorises them as static features without recognising their ongoing relevance and the

potential impacts of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural implications and overlooks their vital role in community life.

Furthermore, the application disregards the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the community's historical relationship with the coastal environment. These elements are essential to the area's identity and are entirely omitted from the assessment, which represents a substantial gap. Neglecting these factors severely hampers a comprehensive understanding of the cultural impacts associated with the proposed development.

Additional concerns arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural traits akin to those of Indigenous Peoples, has not been afforded the Free, Prior and Informed Consent process. This lack of genuine engagement undermines the credibility of the assessment and fails to adhere to established participatory principles in matters that impact cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement stipulated by the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. The absence of this assessment alone precludes a lawful determination of the proposal.

From a policy standpoint, these shortcomings place the development proposal in clear opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a significant deviation from policy expectations.

When considered collectively, the inadequacies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory duties create a substantial evidential gap. The cultural impacts of the development remain inadequately addressed, and the application fails to establish a solid foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This situation creates a significant evidential gap, preventing both the public and the competent authority from fully understanding the social risks identified through the developer's research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore grounded in reality, not speculation. Nevertheless, the lack of disclosure of the full assessment hinders proper scrutiny of the findings, limiting the ability to evaluate their

significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Despite this, these impacts have not been adequately incorporated into the main application or given appropriate consideration. The failure to publish the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis for balancing benefits against harm.

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; however, the evidence presently available points to existing adverse effects that have not been fully revealed. In the absence of the complete assessment, compliance with this policy remains unproven.

The procedural implications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application, failing to meet the evidential requirements outlined by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient 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 proposed introduction of large-scale turbines near the shoreline poses an immediate risk of creating a continuous industrial presence that would fundamentally alter this character. This transformation of the landscape would be permanent and irreversible.

The application fails to adequately represent the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would erode the essential qualities of naturalness and remoteness and significantly impact visual amenity. The assessment does not convey the true level of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these as isolated assets neglects their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This impact transcends visual implications, introducing broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment weakens any assertion of policy compliance.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with the project is fundamentally flawed, failing to address the comprehensive impacts stemming from what constitutes a single integrated development. The offshore turbines and the onshore works are interconnected, yet they are evaluated in isolation, leading to a fragmented assessment that obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the cabling that traverses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through ecologically sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and

ecologically sensitive habitat. The application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The application also neglects to assess onshore impacts adequately, which prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates a holistic consideration of all project components; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection, are also present. The application fails to demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a notable evidential gap regarding biodiversity protection.

Moreover, concerns arise regarding carbon balance due to the disturbance of peatland, which can release stored carbon and potentially create a carbon debt, undermining the objectives of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or procedures have been initiated, leading to questions about the project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant omission. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposal includes the installation of permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Additionally, the application fails to evaluate the impact of this lighting on visual

amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is critical, especially given the importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. Consequently, this gap in the overall landscape and environmental assessment is considerable.

More importantly, there is no analysis of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to their phototactic responses, which can result in disorientation and increased risks of collision. The application does not contain any lighting impact assessments or phototaxis studies, thus failing to evaluate how the proposed aviation lighting may influence these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal behaviours and related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been addressed. The lack of site-specific night-time data presents a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites could be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and prevents a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4, which addresses the need to protect natural places and maintain environmental quality. Moreover, they undermine the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a crucial aspect of the overall ecosystem.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with sustainable development requirements as mandated by statutory duties and national policy. It echoes the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, this application is set against a more rigorous policy framework that emphasises the importance of biodiversity, the protection of peatlands, the integrity of landscapes, and the wellbeing of communities.

A critical examination reveals that the proposal lacks a complete and reliable evidential

foundation necessary for determination. Notable gaps exist in baseline data, with the application relying on an undefined design envelope and unspecified mitigation measures. Additionally, crucial impact pathways have been overlooked, including effects on nocturnal wildlife, the full spectrum of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment fails to adequately address likely significant effects or residual impacts.

Moreover, the application demonstrates procedural shortcomings. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment results in a material omission. These shortcomings inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, nor does it substantiate acceptable impacts on health and wellbeing. Furthermore, the absence of tourism impact modelling fails to demonstrate a net economic benefit. The cumulative effects of offshore and onshore components have not been thoroughly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and hindering a lawful determination of acceptable impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

In light of these concerns, 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 strongly object to this wind farm for numerous reasons. Mainly, destroying the views and coastline that's laced with beautiful sandy beaches, the scenery and untouched remote areas are what makes the islands special, for that to be ruined and barely benefit the island itself is a real tragedy. If they were moved further south of the island where it's mostly cliffs (Mangersta) I wouldn't object so much. This will be seen from every beach on the west coast, I'm concerned about the debris falling from them, the micro particles wear and tear and oil that may harm the environment and wildlife, who will monitor, record and clear any torn parts that arrive at the beach, who will pay for the decommission when the company goes bust before they have to pay up. The whole farm should not be progressing at all until the infrastructure can cope with all the farms already being switched off regularly. It's being rushed in and we do not want our island industrialised.

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: 583E81A9

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal lacks a solid evidential foundation for a lawful determination. Essential environmental data is absent, with limited and inconsistent baseline information, and several critical aspects of the proposal remain undefined. The application employs a flexible design framework that hinders a clear understanding of the likely significant effects. Moreover, the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects lack robust evidential support.

The application demonstrates clear policy inconsistencies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient evidence to prove that the national obligations regarding biodiversity, climate interests, and environmental integrity will be met. These inconsistencies challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises substantial concerns, with large turbines sited close to the shoreline, resulting in significant implications for landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete, failing to provide a full, transparent, or reliable account of the likely environmental effects of the

proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and hinders a consistent application of a worst-case scenario. This compromises the integrity of the assessment, preventing both the public and the competent authority from comprehending the true extent of environmental impacts.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined. This deferral means that environmental harm is expected to be addressed post-consent, inhibiting any meaningful evaluation of effectiveness or assessment of residual impacts. Such a process is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and reliance on assumptions instead of site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the combination of an undefined design envelope, absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report fundamentally flawed. These deficiencies obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, particularly within the context of the West Lewis coastal environment, which is noted for its sensitivity and biological activity. The methodologies employed in the assessment fail to adequately capture crucial information regarding species presence, behaviour, and habitat use, leading to an incomplete understanding of ecological receptors. Consequently, the evidential basis for evaluating impacts is insufficient.

A notable shortcoming involves the treatment of otters, recognised as a European Protected Species. The assessment does not adequately account for their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a failure to assess the potential impacts of construction-related disturbance, noise, and increased activity. This oversight raises questions about the validity of the conclusions drawn regarding the absence of significant effects on this species.

Further limitations are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that suggest frequent usage of these waters. The lack of integration or proper consideration of such data contributes to an incomplete baseline, undermining the reliability of the conclusions reached.

The methodological flaws present in the assessment mean that the conclusions of negligible or non-significant effects are largely based on assumptions rather than on solid evidence. The absence of sufficient baseline data hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual risks faced by 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 protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it follows that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions undermines the reliability of the assessment. These deficiencies inhibit a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant flaws, marked by considerable gaps in evidence and internal inconsistencies that call its conclusions into question. Located within crucial foraging areas and migratory pathways, the development on the west coast of the Isle of Lewis impacts internationally important seabird populations, many of which are already in decline. The application does not adequately demonstrate that these species will remain unaffected, failing to robustly evaluate risks such as displacement, collision, or habitat loss.

A notable contradiction arises within the application itself, as the developer concludes

there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. Furthermore, the assessment lacks sufficient information regarding the impact on seabirds linked to protected areas, including the Lewis Peatlands and St Kilda. It does not fully acknowledge the significance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies used may underestimate mortality rates, particularly in situations where baseline data is lacking and behavioural responses remain poorly understood.

The placement of turbines within a recognised migratory corridor presents an additional serious risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly examine the long-term consequences of sustained mortality in this corridor or the implications for species with small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential standard required to demonstrate no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes any lawful conclusion that could support consent.

Moreover, the deficiencies noted reflect a lack of compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to confirm that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a proper evaluation of impacts and lead to the conclusion that the application does not meet the necessary statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally insufficient and fails to recognise the West Lewis coastline as a dynamic cultural landscape where language, tradition, environment, and community are intrinsically linked. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spaces for spiritual practice, yet the assessment mischaracterises

them as static features. This oversight disregards their continued use and significance, as well as the impact of development on their settings. Consequently, the evaluation of cultural effects is incomplete and overlooks their importance in community life.

Furthermore, the application neglects intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely missing from the assessment, representing a considerable omission. The cultural impact of the development cannot be adequately grasped without considering these elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity and recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to uphold established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to present a robust foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing represents a significant concern and undermines the lawful evaluation of the proposal. The developer commissioned a Social Impact Assessment, including focus groups with local residents, yet has not published the full report. This has resulted in a substantial evidential gap that prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research.

Residents are already reporting measurable stress, anxiety, and concern regarding the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, the inability to access the complete assessment

hampers proper scrutiny of the findings and restricts the capacity to evaluate their significance within the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” appearing in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

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

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm; however, the available evidence indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is not possible.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. This change would create a continuous industrial presence in close proximity to the shoreline, fundamentally transforming the landscape and leading to a permanent and irreversible alteration of its character.

The application does not sufficiently convey the extent of the anticipated visual change. The scale and location of the turbines would dominate the views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the area. The current assessment fails to adequately communicate the significance of this impact in

light of the sensitivity of the landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such a shortcoming risks underestimating the magnitude of visual impact, which casts doubt on the credibility of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interconnected through visual and spatial relationships with the Atlantic horizon. The treatment of these heritage assets as isolated entities overlooks their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and diminishing their connection to the natural horizon. This not only constitutes a visual concern but also inflicts broader cultural and spatial harm that remains inadequately addressed in the application.

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

Additionally, it is evident that the identified impacts are unlikely to be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting alterations to the landscape are fundamental and permanent, rather than amenable to reduction through mitigation measures.

In summary, the assessment does not accurately portray the extent of the impact, the environmental sensitivity, or the interconnectedness of the landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks raises significant concerns regarding the potential environmental effects of the proposal. The project necessitates extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans limits the ability to evaluate the proposed mitigation and contingency measures, which are deferred until after consent is granted. This reliance on future, undefined measures is particularly

alarming given the sensitivity of the receiving environment.

The West Lewis coastline, known for its clean coastal waters and vital habitats, is susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures. Moreover, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation further complicates the assessment. Without rigorous modelling and clearly defined management strategies, it remains 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 identified as sensitive in the broader assessment.

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a thorough evaluation of construction and pollution risks, supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. The application fails to provide a robust evaluation of the ecological or socio-economic impacts, raising significant concerns about the protection and maintenance of these habitats and uses without substantial disruption. A critical issue lies in the assumption that fishing activities can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or capable of sustaining additional pressure. This lack of information is important, as the risk of overfishing in different areas poses potential wider economic implications for the local fleet.

Moreover, the proposal introduces considerable risks to marine species, particularly due to underwater noise from construction activities. The high-energy hammer piling

anticipated over a prolonged period is expected to disturb marine life over extensive areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses the severity of these impacts without adequate supporting evidence.

Additionally, there exists an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously minimising the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

The assessment also overlooks the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies highlighted—particularly the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These gaps obstruct a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting is visible over long distances and represents a significant change to the area's visual amenity and landscape character. However, the Environmental Impact Assessment fails to evaluate the impact of this lighting, which is a material omission given the importance of dark skies to the identity of the West Lewis coastline and its emerging tourism sectors, including astro-tourism.

Furthermore, the absence of any assessment regarding nocturnal wildlife is particularly concerning. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase their risk of collision. Despite this, the application does not provide any lighting impact assessment or phototaxis study to evaluate how the proposed aviation lighting may affect these vulnerable species or lead to increased mortality rates.

The ornithological assessment relies solely on daytime survey data, which fails to account for nocturnal activity and the associated risks for species like Kittiwakes that may forage or migrate at night. This lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, the omission of these assessments contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis results in an incomplete application that is incapable of supporting a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that preclude it from meeting the necessary standards for sustainable development in accordance with statutory duties and national policy. The issues mirrored those identified in the 2008 refusal of the Lewis Wind Power proposal, which highlighted an unacceptable level of industrialisation. Despite the existence of a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the present application fails to fulfil these critical requirements.

There are substantial gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, along with unspecified mitigation measures, raises concerns about the reliability of the information presented. Key impact pathways have not been addressed, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and potential effects on tourism. As a result, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings further undermine the application. Notably, the lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations established by the Islands (Scotland) Act 2018. Additionally, the omission of a full Social Impact Assessment limits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These oversights collectively render the application unsuitable for determination.

Moreover, the proposal is at odds with the National Planning Framework 4, failing to

adequately protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts, both offshore and onshore, has not been thoroughly conducted, leading to a lack of clarity regarding effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent, failing to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, obstructing a lawful conclusion that impacts can be deemed acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, in conjunction with policy conflicts and outstanding environmental risks, inhibit the ability to reach a lawful, evidence-based decision. The competent authority is therefore urged to refuse consent for the Spiorad na Mara Offshore Wind Farm in its entirety or to invoke the appropriate regulatory measures to demand the submission of the necessary missing information.

Additional Comments

Concern over local wildlife, and preservation of biodiversity. Far too close to land, surely will have health impacts. Eyesore.

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: B1B16096

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and associated documentation, highlighting several material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the project, as these factors call into question its alignment with statutory requirements, national policy, and sustainable development principles.

A critical issue is that the application does not provide a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The flexible design framework employed complicates the understanding of likely significant effects, and the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal is marked by 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, 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. These conflicts are directly linked to the statutory tests necessary for consent and undermine the capability of the competent authority to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal, characterised by large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a comprehensive, transparent, or reliable overview of the proposal's likely environmental effects. Central to this inadequacy is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty, hindering the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, restricting both the public's and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unarticulated at this stage. Seeking consent based on the premise that environmental harm will be mitigated subsequently obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. Such a deferral of vital information to post-consent phases is procedurally unacceptable, contradicting the essential purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These issues contribute to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot confirm that impacts have been thoroughly assessed or that appropriate safeguards have been established.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured, evidence-based comparison of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It

presents a narrative of project evolution instead of a reasoned analysis of realistic options based on environmental effects. This omission indicates that less harmful alternatives have not been adequately identified, assessed, and chosen over more damaging solutions.

There is no clear comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impacts. Therefore, the absence of this analysis means that one cannot conclude that the proposed siting is the least damaging option available.

The deficiencies also extend to the evaluation of cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy limits the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that reinforces the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment conducted regarding marine ecology and protected species is significantly flawed, lacking a complete and reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity; however, the baseline data gathered is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat usage of various species. Consequently, there is a lack of a sound evidential basis for evaluating the potential impacts of the proposed development.

Notably, there is a critical oversight concerning otters, which are designated as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate

assessment of the potential impacts resulting from construction disturbances, noise, and increased activity levels. This oversight diminishes the credibility of any conclusions made regarding the absence of significant effects on this species.

Further concerns arise in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, especially under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or appropriately consider this data contributes to an incomplete baseline and undermines the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks posed to marine species and their habitats.

From a regulatory viewpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty generated by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, granting consent cannot be justified within a lawful framework.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction is evident, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a reductive perspective, viewing it merely as a collection of isolated and static features.

A notable shortcoming in the assessment is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active burial grounds and centres of spiritual practice; however, the evaluation treats them as unchanging elements, neglecting their contemporary use and the implications of development on their surroundings. This misrepresentation leads to an incomplete

understanding of cultural impacts, failing to acknowledge the cemeteries' role within the life of the community.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These aspects are vital to the area's identity and are conspicuously absent from the assessment, representing a critical omission. Consequently, the true cultural ramifications of the development cannot be accurately assessed without addressing these factors.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018, represents a significant procedural lapse. Without this assessment, the competent authority cannot fulfil its statutory obligation to evaluate the social, cultural, and economic consequences for the island community, thereby hindering a lawful determination.

From a policy standpoint, these inadequacies place the proposed development at odds with National Planning Framework 4, particularly concerning the preservation of historic sites and assets. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, constitutes a clear deviation from policy directives.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately evaluated, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment is significantly lacking in transparency, rendering it inadequate for lawful evaluation. Although a Social Impact Assessment was commissioned by the developer and included input from local residents through focus groups, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, which hinders both the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Summaries that are accessible reveal that residents are currently suffering from measurable levels of stress, anxiety, and concern due to the scale and proximity of the

proposed development. These issues stem from direct engagement with the community and are thus firmly rooted in reality. However, the absence of the full assessment prevents thorough scrutiny of these findings and constrains the ability to evaluate their importance in the decision-making process.

Furthermore, there is clear evidence that the proposal is viewed as a threat to community identity and cohesion, with the developer's findings highlighting "cultural loss." Despite this, such impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the complete Social Impact Assessment effectively obscures the genuine 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 effects is crucial for projects of this magnitude, especially when community character and functionality may be compromised. By withholding the complete dataset, the application does not provide a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet available evidence points to existing negative impacts that have not been fully disclosed. Without the complete assessment, it is impossible to affirm compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission in the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment inadequate and untrustworthy. This inhibits a lawful determination and strengthens the argument that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations

expected. Due to their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

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

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

In conclusion, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria of sustainable development when evaluated against

statutory obligations, national policy, and evidential standards. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the

missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E230F505

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental impact, cultural considerations, and procedural aspects. The development site is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and robust cultural heritage. Concerns about the scale, proximity, and design of the proposed wind farm raise serious questions regarding its alignment with statutory obligations, national policies, and the principles of sustainable development.

The submission lacks a comprehensive evidential basis necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many important elements of the proposal remain undefined. The flexible design framework employed makes it difficult to ascertain potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It has not demonstrated adherence to national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts relate directly to the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal in this particular location poses additional challenges, with large turbines positioned alarmingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy underscore that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle is paramount.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the 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 threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to provide an adequate assessment of alternatives, which is essential for compliance with the Environmental Impact Assessment regime. Instead of offering a structured, reasoned comparison of viable options based on their environmental effects, it presents a narrative detailing the evolution of the project. This

method does not confirm that less harmful alternatives have been thoroughly identified, assessed, and favoured over more damaging options.

There is a lack of transparent and evidence-based comparisons regarding alternative offshore sites, development scales, or design configurations. Notably, the developer has not convincingly evaluated the possibility of positioning turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the significance of proximity to shore in assessing impact underscore the necessity for such analysis. The failure to provide this prevents any assertion that the proposed siting is the least damaging alternative.

These shortcomings also extend to the assessment of cable routing and landfall. There is inadequate evidence that alternative routes have been thoroughly considered to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that the design has not been effectively mitigated, leading instead to an over-reliance on mitigation measures post-design.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy and inhibits the competent authority from evaluating whether there are less harmful and more suitable alternatives available. Without a robust assessment of alternatives, it is impossible to ascertain that the proposal is sustainable or in compliance with relevant policies.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, specifically concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a substantial omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant oversight involves otters, a European Protected Species. The application does not properly recognise and assess their use of coastal areas for foraging and movement. This neglect of their core foraging range and behavioural patterns results in inadequate consideration of the potential effects of construction disturbance, noise, and increased activity. Such deficiencies undermine any

conclusions about the absence of significant effects on otters.

In assessing basking sharks, the application relies on aerial surveys, which introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations showing frequent usage of these waters. The failure to incorporate relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

Methodological shortcomings mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to identify or assess protected species adequately. This level of uncertainty 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.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application demonstrates significant deficiencies, ultimately leading to an unreliable conclusion regarding its environmental impact. A critical area of concern is the presence of contradictory findings within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously put forward a Habitats Regulations derogation case, which should only arise in situations where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the assessment and suggests that the findings do not have a solid evidential foundation.

Additionally, the ornithological assessment contains major gaps in evidence, particularly in relation to the seabird populations that inhabit the west coast of the Isle of Lewis. This area is home to internationally important seabird species, many of which are already in decline. The application fails to convincingly demonstrate that these species will remain unaffected, particularly concerning the key foraging areas and migratory pathways where the development is sited. The implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

Moreover, the assessment does not sufficiently account for the significance of feeding

grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies used in the assessment are likely to underestimate the potential for mortality among species like Kittiwakes and Fulmars, especially given the lack of complete baseline data and a thorough understanding of their behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and the limitations of the modelling employed means that the standard of beyond reasonable scientific doubt has not been met. This situation necessitates engagement with the precautionary principle, undermining the validity of any conclusions drawn in support of the proposal.

Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the application in direct conflict with national policy.

In summary, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence collectively hinder a thorough evaluation of the potential impacts. Consequently, the application does not fulfil the statutory requirements necessary for proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. It adopts an overly simplistic view by treating cultural heritage merely as isolated and unchanging assets, rather than as dynamic elements with ongoing social, cultural, and spiritual significance within the community.

Cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices, are mischaracterised as static features. This oversight neglects their continuous use and meaning, as well as the potential effects of development on their surroundings. As a result, the evaluation of cultural impacts remains fundamentally incomplete and overlooks the vital role these sites play in community life.

Moreover, the absence of consideration for intangible cultural heritage, such as the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment, is a critical shortcoming. These elements are essential to the identity of the area but have been completely disregarded in the

assessment, leading to a failure in understanding the true cultural implications of the development.

There are serious concerns regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been consulted through a Free, Prior and Informed Consent process. This lack of meaningful engagement raises questions about the legitimacy of the assessment and contradicts established principles that promote participation in decisions impacting cultural and environmental interests.

Additionally, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission means the competent authority cannot legally assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These oversights also place the proposal at odds with the National Planning Framework 4, specifically concerning the protection of historic assets and spaces. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly deviates from policy obligations.

Ultimately, the inability to adequately assess living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application lacks a sound basis for determining the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the development is significantly lacking in transparency and substance. Although the developer commissioned a Social Impact Assessment that included local resident focus groups, the full report has not been made available. This omission creates a critical evidential gap, limiting public understanding and hindering the competent authority's ability to evaluate the social risks identified in the developer's own research.

Summaries that are available indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are the result of direct engagement with the community and are not based on speculation. However, the absence of the complete assessment restricts thorough scrutiny of these findings and undermines efforts to assess their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." Despite these serious concerns, the full impacts have not been adequately addressed in the main application, nor have they been given the appropriate consideration. The failure to disclose the complete Social Impact Assessment

obscures the true social and human costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, particularly when community character and functioning might be affected. The failure to provide the complete data set results in the application lacking a solid evidential foundation necessary for weighing the benefits against potential harms.

From a policy viewpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm. The evidence currently available suggests existing adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is impossible.

Procedurally, the implications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a substantial omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines in close proximity to the West Lewis coastline raises significant concerns regarding its impact on the seascape, landscape, and visual amenity. This area is defined by its open Atlantic horizon, undeveloped character, and strong sense of remoteness. The planned industrial presence would create a continuous and dominant feature, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

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

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

thereby affecting the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The application treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is both incomplete and lacking the necessary detail to properly evaluate likely environmental effects. There is a substantial undertaking involved in seabed preparation and installation works within the challenging high-energy Atlantic environment. However, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on vague mitigation and contingency measures to be established after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment

mobilisation and accidental chemical or oil spills, it does not offer sufficient information on how these issues will be prevented, controlled, or monitored.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of such impacts. This uncertainty also extends to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these concerns is the absence of detailed emergency response procedures. By deferring contingency planning until after consent has been granted, the application hampers the ability to evaluate whether adequate safeguards are in place to address pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to determination.

From a regulatory standpoint, deferring critical environmental safeguards stands in direct conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent is granted; without this information, a lawful determination cannot be made. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further reinforcing the view that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries associated with the application is inadequate, failing to offer a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses will be protected or maintained without significant disruption.

A notable concern arises from the assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This gap is critical, as such displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is concerning; nevertheless, the application tends to underestimate the significance of these effects and lacks adequate supporting evidence.

There exists a contradiction within the application regarding the necessity of licences for harming European Protected Species, while impacts are concurrently described as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment does not address cumulative impacts resulting from various pressures such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering the determination of whether the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what is a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore elements consist of cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive impact assessment for these onshore elements prevents a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts, the application obstructs a proper evaluation

of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore assessments means that the combined impacts on peatlands, habitats, and communities remain unclear.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This indicates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in adequately addressing this concern or in demonstrating that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been undertaken, prompting questions about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species such as

Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any lighting impact assessment or phototaxis study, neglecting to evaluate how aviation lighting may affect these species or lead to increased mortality.

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

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

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

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

TOURISM

The assessment of tourism impacts is significantly inadequate, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is heavily reliant on these qualities. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, sustaining more than 1,000 jobs and accounting for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and broader economic resilience. Without such analysis, it remains impossible to determine whether the development would yield a net economic benefit or threaten an established and expanding sector.

The assessment also overlooks the crucial role of environmental quality in supporting

tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and growing part of the local economy.

In a community like this island, which suffers from limited economic diversification, the failure to properly assess tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

Collectively, these failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminate in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal raises significant concerns that cannot be overlooked. It fundamentally fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the issues that led to the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a key factor. Presently, it is submitted within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential foundation upon which the application stands. There are inadequacies in the baseline data, and the design envelope remains undefined. Furthermore, the proposed reliance on unspecified mitigation measures and the omission of key impact pathways—including those affecting nocturnal wildlife, onshore infrastructure, and tourism—render the Environmental Impact Assessment incomplete. As a result, it hinders a comprehensive understanding of significant effects or residual impacts.

The proposal also faces procedural shortcomings, particularly the absence of a compliant Island Communities Impact Assessment, which contravenes the statutory duty established by the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a substantial omission. These deficiencies obstruct

the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately deeming the application unsuitable for determination.

Contradicting the National Planning Framework 4, the proposal does not adequately safeguard biodiversity, natural places, or cultural heritage. It fails to demonstrate that impacts on health and wellbeing are acceptable, nor can it evidence a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been sufficiently conducted, concealing effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle and prevents a lawful determination of acceptable impacts.

Moreover, the proposal would induce profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruption of cultural and visual relationships, along with the adverse effects on tourism, represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination, both procedurally and substantively. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs the possibility of a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the appropriate regulatory measures to mandate the provision of the necessary information.

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

Additional Comments

Living in Wester Ross I am concerned about cumulative impacts of these proposals, and the cavalier way the process and the precautionary principle are dismissed with these proposals. If this goes ahead nowhere else will be safe from similar destructive industrialisation. The proposal is unnecessary and destroys people, communities and the life support system on which we all depend. It serves only to pour public money into the private pockets of international criminals at public expense. Token community benefit payments are simply insulting to local people.

There is no public interest justification for this development at all

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: E3CCFABF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies in planning, environmental considerations, cultural factors, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and strong cultural heritage. Concerns about the proposal's scale, proximity to the coast, and design raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There is an absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant impacts, and the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

There are significant policy conflicts evident in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application does not convincingly demonstrate compliance with national standards for protecting biodiversity, climate concerns, and environmental integrity. These discrepancies directly impact the statutory tests for consent and compromise the competent authority's ability to determine whether the development is acceptable within policy guidelines.

The proposal's scale is unprecedented for this area, with large turbines situated close to the shoreline, raising serious concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrates that the application is incomplete and unsuitable for lawful approval. Under these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and fails to deliver a full, transparent, or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, making it impossible for the public and competent authorities to fully understand the potential environmental impacts of the development, as the effects outlined may not accurately reflect what will ultimately be constructed.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later date prevents a meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the core objective of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential gaps, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and the presence of gaps in baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving 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 lacks completeness and reliability, failing to provide an accurate understanding of the ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and

biologically active marine system, yet the baseline data is insufficient. The methodologies employed in the assessment do not adequately capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap in the assessment concerns otters, classified as a European Protected Species. The application does not appropriately recognise or evaluate their active use of coastal regions for foraging and movement. The omission of crucial factors such as their core foraging range and behavioural patterns undermines the assessment of potential effects arising from construction disturbances, noise, and heightened activity. This oversight diminishes the validity of any conclusions regarding the absence of significant impacts on this species.

Furthermore, there are notable deficiencies in the evaluation of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This situation is compounded by established land-based observations that indicate frequent use of these waters. The failure to adequately consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects appear to be based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty about the true risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been duly identified or assessed. The introduced uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

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.

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 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 assessment regarding the impacts on fisheries and marine life is inadequate and fails to present a thorough evaluation of both ecological and socio-economic consequences. The waters along the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not adequately

demonstrate how these activities and habitats can be preserved or maintained without significant disruption.

A notable concern is the presumption that fishing activities can simply be shifted without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can handle increased pressure. This gap is crucial, as the risk of overfishing in other areas could arise, potentially leading to broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the effects on fisheries and livelihoods remains incomplete.

Furthermore, the proposal presents significant risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for extended durations is expected to create disturbances over considerable distances, impacting species such as dolphins. The predicted disruption to a large segment of the local bottlenose dolphin population raises important issues, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

There is also a striking inconsistency within the application, as it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously describing those impacts as negligible. This contradiction undermines the trustworthiness of the assessment and raises issues related to adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal permission.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of a thorough evaluation of these combined effects, it is impossible to ascertain the overall consequences for 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 exist alongside current marine users or avoid unacceptable consequences for marine biodiversity, which hinders the conclusion that the proposal embodies sustainable development.

When considered as a whole, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings impede a thorough evaluation of the repercussions for marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is

noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and potential for tourism, particularly in developing sectors like astro-tourism. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive wall of light across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Such an oversight is particularly concerning given the critical role that dark skies play in the area's identity. Furthermore, there is a lack of assessment regarding the effects on nocturnal wildlife, including species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are sensitive to artificial lighting. This can cause disorientation and heighten collision risks. The application does not contain a lighting impact assessment or a phototaxis study, failing to examine how the proposed aviation lighting might impact these species or contribute to increased mortality rates.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the related risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data results in a crucial void in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the safeguarding of natural areas and the maintenance of environmental quality. It further diminishes the overall appraisal of landscape and seascape impacts, as the character of night-time settings is a fundamental aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a considerable evidential gap. The lack of baseline data, impact modelling, and specific analysis of species means the application is incomplete and cannot support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to comply with the principles of sustainable development as outlined by statutory duties and national policy. This application echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting this new proposal under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and

community wellbeing does not mitigate the underlying issues.

Critical deficiencies in the evidential basis for assessment are evident. There are notable gaps in baseline data, an undefined design envelope continues to be used, and unspecified mitigation measures are relied upon. Furthermore, key impact pathways—such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism—have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

Procedural shortcomings are also apparent. The lack of a compliant Island Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission that limits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling precludes evidence of net economic benefit. Moreover, the cumulative impacts of both offshore and onshore components have not been properly evaluated, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals lead to internal inconsistencies. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing lawful conclusions regarding the acceptability of impacts.

This proposal would result in irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and adverse effects on tourism represent permanent changes that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct the ability to reach a lawful, evidence-based decision. It is imperative that the competent authority refuses consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or utilises the relevant regulatory provisions to demand the submission of the missing information.

Additional Comments

Its a stunning landscape that needs to be kept as it is.

The highlands have such a huge wildlife and marine life, they need to be preserved and keep their homes as they are.

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: B5A42A3D

Member of the public 1740

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

The unprecedented scale of the proposal in this area, with large turbines being positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and lacks a full, transparent, or reliable account of the potential environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This approach undermines the integrity of the assessment and means that the impacts reported may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are hindered in understanding the true extent of environmental effects.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding marine ecology and the assessment of protected species, which is materially deficient. The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the existing baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. This inadequacy

leads to a lack of sound evidential basis for evaluating potential impacts.

Among the key issues is the failure to recognise and properly assess otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The application does not take into account their core foraging range and behavioural patterns, which means the assessment does not adequately consider the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks exhibits similar deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which is likely to underestimate their presence. This is particularly concerning when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or give proper consideration to such data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. Additionally, the absence of sufficient baseline data hinders meaningful evaluations of cumulative and indirect impacts, which include seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant internal inconsistencies and methodological weaknesses. It fails to meet the necessary evidential threshold to confirm that the integrity of protected sites will remain unaffected. Notably, the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects, particularly given its location within key foraging areas and

migratory pathways.

Moreover, the application presents a fundamental contradiction: while the developer asserts there will be no significant adverse effects, they simultaneously present a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack robust support from the evidence provided.

The assessment overlooks essential evidence regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. It fails to fully consider the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty. This is especially problematic for species like Kittiwakes and Fulmars, which are in severe decline, as the methodologies used may underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines in a recognised migratory corridor presents additional risk, effectively creating barriers 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 sustained mortality in this corridor or the potential impacts on species with small global populations.

Collectively, the gaps in data, contradictory conclusions, and limitations in modelling mean that the standard of proof required to eliminate reasonable scientific doubt has not been met. This situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent. Furthermore, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4, which mandates biodiversity protection and the safeguarding of natural assets. Consequently, the inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, these shortcomings contribute to the conclusion that the application fails to meet the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the full scope of social risks identified in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due to the size and proximity of the proposed development. These reactions stem from direct engagement with the community and are therefore rooted in reality, not speculation. However, without access to the full assessment, proper scrutiny of these

findings is impossible, which limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these identified impacts, they have not been adequately reflected in the application nor given appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs of the development.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting will be visible over long distances and creates a continuous intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially important given the role of dark skies in the area's identity and the potential for growth in tourism sectors such as astro-tourism. The omission of these impacts results in a notable

shortfall in the overall landscape and environmental assessment.

Additionally, there is a complete absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and higher collision risks. The application lacks any lighting impact assessment or study of phototaxis, failing to consider how the proposed aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence 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 becomes impossible to determine whether protected species or designated sites could be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt remains unmet, 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 areas and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes the core concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite 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 critical areas.

A significant concern is the incomplete and unreliable evidential basis for determination. There are notable gaps in baseline data and an undefined design envelope is employed, alongside unspecified reliance on mitigation measures. Key

impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, have been omitted from the assessment. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment is a material omission. These gaps impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and the absence of tourism impact modelling prevents evidence of any net economic benefit. Additionally, the cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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: FD50F279

