

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and associated documentation, it is clear that there are significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the development raise fundamental questions about 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 concerning absence of critical environmental data, and the baseline information provided is limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, while claims regarding negligible or non-significant effects are unsupported by robust evidence.

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

The scale of this proposal is unprecedented for the area, with large turbines planned to be placed in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is incomplete. The methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound basis for evaluating impacts.

One significant omission involves otters, a European Protected Species. The application does not appropriately recognise or assess their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are not properly assessed. This lack of assessment undermines any conclusions about the absence of significant effects on this species.

Additionally, there are deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This likely leads to an underestimation of their presence when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological limitations mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This generates uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the Environmental Impact Assessment regime or National Planning Framework 4 requirements, as protected species have not been properly identified or assessed. The uncertainty this introduces prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant flaws, revealing substantial gaps in evidence and inconsistencies that challenge its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the assessment inadequately considers the risks of displacement,

collision, or habitat loss.

There is a notable contradiction in the application: the developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding areas is not thoroughly addressed, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The proposed location of turbines within a recognised migratory corridor raises further concerns, as it could create a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory claims, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hampers a lawful conclusion supporting consent. Moreover, the identified deficiencies indicate a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is deemed unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken by the application is reductive, viewing heritage merely as isolated and static assets, rather than understanding their ongoing social, cultural, and spiritual relevance to 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 sites

for burial and spiritual practices; however, the assessment classifies them as unchanging features, failing to acknowledge their continued significance and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and overlooks their vital role in community life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These aspects are essential to the area's identity, yet they are conspicuously absent from the assessment, highlighting a critical omission. Without addressing these components, the cultural implications of the development cannot be comprehensively understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's validity and fails to adhere to established principles for participation in decisions that impact 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. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The cultural ramifications of the development have not been adequately assessed, leading to the conclusion that the application does not offer a sufficient foundation for gauging the true cultural cost of the proposal.

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 assessment provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential

environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on these vague future measures raises serious concerns, particularly due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these risks will be prevented, managed, or monitored.

Furthermore, there is considerable uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether effective safeguards are available to address pollution incidents. This procedural risk weakens the competent authority's capability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the postponement of key environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is issued, and when such information is absent, a lawful determination cannot occur. Additionally, the application does not adequately demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment seriously flawed. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against legal obligations, national policy, and evidence standards. This application mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable

level of industrialisation was noted. It is presented now under a more robust policy framework that places additional emphasis on biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant gaps in the evidential basis for this application. It lacks comprehensive baseline data, utilises an ambiguous design envelope, depends on unspecified mitigation measures, and omits crucial impact pathways related to nocturnal wildlife, the full extent of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the failure to provide a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal directly contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to show that the health and wellbeing impacts are acceptable and cannot substantiate a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been assessed properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information deficiencies, along with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1DAC7EEB

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

Dear Sir/Madam

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

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to definitive turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment and making it impossible for both the public and the competent authority to comprehend the actual extent of environmental effects.

Consent for the application is sought primarily on the basis of unspecified mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach defers crucial information to post-consent stages, which is procedurally unacceptable. It conflicts with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Furthermore, there are critical evidential deficiencies, including significant gaps in baseline data, limitations in methodology, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions about negligible or non-significant effects are made without robust supporting data. Such a lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including stipulations about biodiversity protection and environmental integrity, as it cannot be proven that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority is not positioned to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

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

presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a sound evidential basis for evaluating potential impacts.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant deficiencies, characterised by substantial gaps in evidence and contradictions that undermine its validity. The application does not demonstrate, to the requisite evidential standard, that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will not suffer adverse effects. The proposed development is situated within crucial foraging areas and migratory routes, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is

anticipated. This contradiction raises serious concerns about the reliability of the assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully take into account the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor further compounds these risks, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and the potential impact on species with relatively small global populations have not been adequately assessed.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed and overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic approach, reducing heritage to a collection of isolated, unchanging assets, rather than recognising their active social, cultural, and spiritual significance within the community.

One major shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice, yet the assessment classifies them as mere static

features, failing to acknowledge their ongoing use, importance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural impacts and neglects their role in community life.

Moreover, the assessment does not take into account intangible cultural heritage, such as the Gaelic language and traditions, nor the longstanding connection between the community and the coastal environment. These elements are vital to the area's identity but are completely disregarded in the assessment, marking a significant oversight. Without addressing these factors, the cultural consequences of the development cannot be accurately comprehended.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristic of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone precludes a lawful determination.

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

Ultimately, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory duties results in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment conducted by the developer is a critical shortcoming that affects the evaluation of the application. While the developer engaged local residents through focus groups, the full report remains unpublished, leading to a significant evidential gap. This absence hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Evidence suggests that residents are experiencing measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposed development. These

findings are based on direct engagement and should not be viewed as speculative. However, without access to the complete assessment, the findings cannot be adequately scrutinised, and their significance in the decision-making process is diminished.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with the developer's findings highlighting concerns over “cultural loss.” These social impacts have not been sufficiently acknowledged in the main application and have not been assigned the appropriate weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset leads to an incomplete evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. It is required that developments promote positive health outcomes and avoid causing harm. However, the evidence currently available points to existing adverse effects that have not been fully disclosed. Thus, without the full assessment, compliance with this policy remains unproven.

The procedural implications of this situation are profound. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with documented evidence of adverse impacts, renders the evaluation incomplete and unreliable. This situation hampers a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

the significance of these impacts on such a sensitive landscape.

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

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to recognise their interdependence, resulting in an incomplete evaluation of their cultural significance and setting.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within the Atlantic's high-energy environment. However, the assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead relying on mitigation and contingency measures that are to be formulated after consent is granted. This approach hinders any substantial assessment of their potential effectiveness or adequacy.

The reliance on unspecified future measures raises serious concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, both of which are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it does not sufficiently outline how these risks will be prevented, controlled, or monitored.

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

The lack of comprehensive emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces procedural risks and diminishes the capacity of the competent authority to adequately assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent; the absence of such information means that a lawful determination cannot be made. Additionally, the application does not illustrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings preclude a thorough evaluation of construction and pollution risks and further emphasise that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application presents an inadequate assessment of fisheries and marine life. It fails to offer a robust evaluation of both ecological and socio-economic impacts, raising immediate concerns about the potential disruption to these critical uses and habitats.

A primary flaw lies in the assumption that fishing activity can be displaced without any consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This significant omission poses risks of overfishing in other areas and could lead to wider economic ramifications for the local fishing fleet. Without a clear, evidence-based

assessment, the implications for fisheries and local livelihoods remain obscure.

The proposal introduces serious risks to marine species, notably due to underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is likely to disrupt species such as dolphins across considerable distances. The projected impact on a notable portion of the local bottlenose dolphin population raises urgent concerns, yet the application downplays these effects, lacking sufficient supporting evidence.

There is a troubling inconsistency in the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises significant questions about compliance with the Habitats Regulations, especially where anticipated harm would require legal authorisation.

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

From a policy standpoint, the application does not comply with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with what constitutes a single integrated development. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a fragmented approach that obscures the comprehensive environmental and socio-economic effects of the project.

The onshore components consist of cabling traversing protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is both a critical carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application fails to allow for an accurate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in tandem, yet the division between offshore and onshore components means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, such as machair systems and peatland environments that enjoy policy protection. The application does not sufficiently demonstrate that the potential impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This presents a substantial evidential gap in relation to the protection of biodiversity.

The proposal also prompts concerns about the carbon balance. Disturbing peatland releases stored carbon, which could create a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently tackle this concern or confirm that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to consider the project in its entirety and to show protections for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment for the proposal fails to address the assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is noted for its exceptionally dark skies, contributing to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which would be visible over long distances, risks creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application lacks any evaluation of the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This absence is particularly important given the significance of dark skies to the area's identity and its potential for sectors such as astro-tourism. Consequently, this results in a distinct gap in the overall landscape and environmental assessment.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel may be adversely affected by artificial lighting due to phototaxis, which can lead to disorientation and increased risk of collision. The application does not include an assessment of lighting impacts or a phototaxis study, failing to consider how aviation lighting may impact these species and increase mortality rates.

The reliance on daytime survey data within the ornithological assessment compounds this issue, as it does not account for nocturnal activities or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data presents a critical gap in understanding ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to determine 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, necessitating engagement with the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission is inconsistent with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It undermines the broader assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the overall ecosystem.

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

TOURISM

The assessment of tourism impacts is critically lacking and fails to address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and its sense of seclusion. Although the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

The tourism sector has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such crucial analysis, it remains unclear whether the development would yield a net economic

benefit or jeopardise a thriving sector.

Moreover, the assessment does not take into account the significance of environmental quality in enhancing tourism, particularly the vital roles of unspoiled landscapes and dark skies in visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a substantial void in understanding its impacts on a recognised and expanding segment of the local economy.

In light of the island community's limited economic diversification, the oversight in evaluating tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

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

The cumulative effect of these shortcomings—failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and overlooking the island's economic dependencies—creates a significant evidential gap. This obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal highlights significant shortcomings in its adherence to sustainable development principles when evaluated against statutory duties, national policies, and evidential standards. This application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. It is now being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

Critical gaps exist in the evidence provided for consideration. The use of an undefined design envelope, unspecified reliance on mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects, undermine the application. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of significant effects or residual impacts.

The proposal also suffers from procedural inadequacies. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a notable

omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contravenes National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to absent tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been properly evaluated, complicating the assessment of their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain internal inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application presents both procedural and substantive issues that render it unfit for determination. The combination of significant information gaps, policy discrepancies, and unresolved environmental risks precludes a lawful, evidence-based decision. Therefore, it is urged that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DC6B5CAB

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The review of the Environmental Impact Assessment Report and associated documentation has revealed significant planning, environmental, cultural, and procedural deficiencies.

The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. However, the scale and design of the proposed development pose serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

Given the unprecedented scale of this proposal and the placement of large turbines close to the shoreline, significant concerns arise related to landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment conducted regarding marine ecology and protected species demonstrates significant deficiencies and fails to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine system. However, the baseline data collected is incomplete, and the methodologies employed

do not adequately capture species presence, behaviour, and habitat usage. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

Notably, the application omits crucial information related to otters, which are classified as a European Protected Species. It does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns undermines any conclusions drawn regarding the potential effects of construction disturbance, noise, and increased activity, leading to an inadequate assessment of significant effects on this species.

Furthermore, the evaluation of basking sharks is similarly flawed. The reliance on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions, which is likely to result in an underestimation of their presence. This issue is particularly pronounced when compared to established land-based observations that indicate frequent usage of these waters. The omission of such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings imply that conclusions asserting negligible or non-significant effects are based more on assumptions rather than robust evidence. The lack of sufficient baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed the protected species involved. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, the granting of consent cannot be deemed lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately leading to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development is flawed, presenting significant gaps in evidence and inconsistencies that undermine its findings. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which hosts internationally important seabird populations that are already in decline. However, the application fails to sufficiently demonstrate that these species will not face adverse effects. There is a critical lack of evaluation regarding the implications of displacement, collision risk, or habitat loss related to the proposed development.

A notable contradiction is present in the application, where the developer asserts there will be no significant adverse effects while also making a case for Habitats Regulations derogation, which is typically only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that its conclusions do not align with the available evidence. Furthermore, the assessment does not adequately ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The reliance on modelling approaches introduces a level of uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe population declines. This may result in an underestimation of mortality rates due to incomplete baseline data and an insufficient understanding of behavioural responses.

The proposed siting of turbines within a recognised migratory corridor adds another layer of significant risk, potentially acting as a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly investigate the long-term effects of sustained mortality within this corridor, nor does it consider the implications for species that have relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in the modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle, thereby obstructing a lawful conclusion that would support consent. Additionally, the identified deficiencies represent a breach of the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is fundamentally flawed, failing to recognise it as a living cultural landscape where the environment, language, tradition, and community are interwoven. The application adopts a narrow perspective that reduces heritage to isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

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

This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These elements are crucial to the area's identity, yet they are entirely overlooked, resulting in a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been engaged through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Another critical failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

These deficiencies place the proposal in direct conflict with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to address both tangible and intangible heritage, alongside the disregard for living cultural practices, marks a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is concerning and raises immediate questions about the validity of the proposal. Despite the developer conducting focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These findings stem from direct engagement with the community and are not mere speculation. However, without access to the full assessment, it is impossible to

scrutinise these findings adequately or to appreciate their significance in the decision-making process.

The proposal has also been identified as a threat to community identity and cohesion, with “cultural loss” being one of the impacts noted in the developer’s findings. Unfortunately, these impacts have not been sufficiently addressed within the main application nor accorded the necessary weight. The failure to release the full Social Impact Assessment obscures the true human and social costs associated with the development.

Moreover, the inadequacy of information undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and functioning are at stake. The application lacks a comprehensive evidential basis required to assess the balance between potential benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 in terms of health and wellbeing. Development should promote positive health outcomes while minimising harm, yet evidence suggests there are existing adverse effects that remain undisclosed. Without the complete assessment, it cannot be asserted that the application complies with this policy.

The implications of these procedural shortcomings are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a critical omission within the application and fails to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

Taken as a whole, the failure to disclose the full Social Impact Assessment alongside clear evidence of existing adverse impacts renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 proposal presents significant deficiencies in the assessment of construction and pollution risks, which is inadequate for evaluating the probable environmental impacts. Critical environmental management frameworks, specifically Construction Environmental Management Plans and Pollution Prevention Plans, are either poorly developed or absent, particularly given the extensive seabed preparation and installation activities proposed within the high-energy environment of the Atlantic. The reliance on unspecified mitigation and contingency measures, which are to be

formulated after consent, hampers any meaningful assessment of their potential effectiveness or sufficiency.

Particularly alarming is the sensitivity of the receiving environment, notably the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to disturbances from sediment and contaminants. Although the application acknowledges the risks related to sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate information on the strategies for preventing, managing, or monitoring these risks.

Furthermore, there exists a degree of uncertainty concerning the magnitude and dynamics of sediment plumes that may arise from seabed disruption and cable installation. The absence of comprehensive modelling and clearly articulated management strategies renders it impossible to ascertain the potential extent, duration, or ecological implications of such impacts. This uncertainty also encompasses effects on marine species and habitats, which are already recognised as sensitive within the broader assessment framework.

The lack of specific emergency response protocols exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to verify whether sufficient safeguards are in place to manage pollution events. This introduces procedural risks and hampers the competent authority's capacity to evaluate environmental protection measures prior to the determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the obligations set forth by the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation measures must occur prior to granting consent; the absence of such information precludes a lawful determination. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation strategies, insufficient management plans, and uncertainties surrounding potential impacts culminate in a materially deficient assessment. These significant shortcomings impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

significant oversight that raises the risk of overfishing and potential economic fallout for the local fleet.

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

The application also reveals contradictions, acknowledging the necessity for licences for any harm to European Protected Species while simultaneously characterising the impacts as negligible. This inconsistency undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly where potential harm is identified that may warrant legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is insufficient and fails to encompass the full range of impacts from a project that should be considered as a cohesive whole. The offshore turbines and the onshore works are inherently connected, yet their evaluation occurs separately, leading to a disjointed analysis that masks the true extent of environmental and socio-economic consequences.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's environmental footprint.

By failing to address the onshore impacts adequately, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements are assessed collectively; however, the disjunction between offshore and onshore evaluations leaves the combined repercussions on peatlands, habitats, and local communities inadequately explored.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application does not sufficiently show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application fails to provide evidence that the requisite consents or processes have been initiated, bringing into question the deliverability and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a unified entity, alongside insufficient demonstration of protection for peatlands, habitats, and land use interests, is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a critical failure in the Environmental Impact Assessment. The absence of evaluation for nocturnal impacts makes it impossible to ascertain if protected species or designated sites would suffer adverse effects. Consequently, the evidential standard needed to exclude harmful impacts beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

The West Lewis coastline, known for its exceptionally dark skies, plays a vital role in the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting, which would be visible over vast distances, creating a continuous "wall of light" that would drastically change the night-time landscape. The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been assessed, despite the significance of dark skies to the region's identity and the burgeoning astro-tourism sector.

Moreover, the lack of evaluation extends to nocturnal wildlife, with species such as

Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel being particularly sensitive to artificial lighting. These species are prone to disorientation and increased collision risk due to phototaxis, yet the application fails to include any lighting impact assessment or phototaxis study. The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it fails to capture nocturnal activity or the associated risks. Kittiwakes, for example, may forage or migrate at night and are also susceptible to disorientation from artificial lighting, but this risk remains unaddressed.

From a policy standpoint, this omission is at odds with National Planning Framework 4, which aims to protect natural places and maintain environmental quality. Furthermore, the lack of consideration for the night-time character significantly undermines the overall assessment of landscape and seascape impacts, which are integral to the environment.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a substantial evidential gap, leaving the application incomplete and incapable of justifying a lawful decision. The absence of baseline data, impact modelling, and species-specific analysis further illustrates the inadequacies of the proposal.

TOURISM

The application presents a concerning deficiency in assessing tourism impacts, crucial for the economy of the Isle of Lewis. With tourism significantly reliant on the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness, the application acknowledges that 86% of visitors are attracted by the scenery. However, it fails to provide any quantified assessment of how large-scale offshore infrastructure could alter visitor numbers, behaviours, or the economic contributions made by this sector.

Tourism has seen substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this, there is no modelling to examine how the potential industrialisation of the seascape and subsequent loss of environmental quality might affect Tourism Gross Value Added or the overall economic resilience of the area. This lack of analysis renders it impossible to ascertain if the proposed development would result in a net economic benefit or detriment to a crucial and expanding sector.

Furthermore, the assessment neglects to address the critical role that environmental quality plays in tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the effects on a recognised and burgeoning segment of the local economy.

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local

businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, the failure to analyse environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies culminate in a significant evidential gap. This inhibits a thorough evaluation of economic effects and supports the conclusion that the application is fundamentally incomplete.

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 proposed wind farm would forever change the environment the people and the area. The natural beauty of the area should be preserved at all cost.

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: A596A930

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. 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 rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and 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 safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is severely lacking, failing to provide a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically rich and sensitive marine system, yet it suffers from incomplete baseline data and inadequate methodologies that do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One significant oversight involves otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased human activity have not been properly evaluated. This gap undermines the conclusions drawn about the absence of significant effects on otters.

The assessment of basking sharks also displays major deficiencies, particularly due to the reliance on aerial surveys, which are prone to detection bias in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to consider or incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thereby introducing uncertainty regarding the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been properly identified or assessed, which leads to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it would be unlawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a development that poses significant concerns regarding its impact on seabird populations along the west coast of the Isle of Lewis, an area known for its internationally important seabird communities, many of which are currently in

decline. The ornithological assessment associated with this proposal is fundamentally flawed, exhibiting substantial gaps in evidence and internal inconsistencies that cast doubt on its conclusions. Key foraging areas and migratory pathways crucial to these species are located within the proposed site, yet the assessment fails to adequately evaluate the risks of displacement, collision, or habitat loss.

A critical inconsistency arises in the application, as the developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This contradiction undermines the reliability of the assessment, suggesting that the conclusions reached do not have a solid evidential basis. Furthermore, the assessment lacks sufficient evidence that seabirds linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The assessment's failure to fully consider the significance of these feeding grounds, coupled with an over-reliance on modelling approaches, introduces a level of uncertainty, especially for declining species such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the inadequacy of baseline data and the limited understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor exacerbates the risks involved, effectively forming a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality within this corridor, as well as the potential impact on species with relatively small global populations, have not been sufficiently assessed by the application. From a regulatory standpoint, the proposal does not meet the evidential standards necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside the data gaps and limitations of the modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful conclusion in favour of consent.

Overall, the deficiencies identified in the assessment signify a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted places the proposal at odds with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. Consequently, a thorough evaluation of the impacts is hindered, leading to the overarching conclusion that the application fails to satisfy the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the seascape, landscape, and visual impacts related to the proposed development is significantly lacking and does not adequately represent the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a

profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would result in a continuous and imposing industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, leaving it insufficient for determining the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it suggests that mitigation and contingency measures will be established after consent is granted, obstructing any meaningful evaluation of their potential adequacy or effectiveness.

This uncertainty regarding future measures is particularly troubling, considering the sensitivity of the environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and pollution. Although the application notes risks such as sediment mobilization and the possibility of chemical or oil spills, it lacks sufficient detail on methods to prevent, control, or monitor these occurrences.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards will be in place to address pollution incidents. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and clarity on potential impacts contributes to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the notion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impact on fisheries and marine life lacks thoroughness and fails to provide a credible analysis of both ecological and socio-economic consequences. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a significant fishing industry, yet the application does not adequately ensure that these vital resources and habitats will remain protected from significant disruption.

A critical concern is the assumption that fishing activities can be relocated without negative repercussions. There is no evidence presented that alternative fishing grounds exist, are accessible, or can sustain additional demands. This lack of information is crucial, as such displacement may lead to overfishing in other areas, adversely affecting the local fishing fleet's economic viability. Without a definitive and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances over large areas, impacting species such as dolphins. The anticipated disruption to a notable proportion of the local bottlenose dolphin population raises significant concerns, yet the application inadequately addresses the severity of these effects, lacking sufficient evidence to support its claims.

The application presents an inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction casts doubt on the validity of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application does not demonstrate alignment 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, thereby hindering the 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 within the application result in an incomplete and unreliable assessment. These shortcomings hinder a robust evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant oversight that compromises the application's validity. The coastline of West Lewis is noted for its remarkably dark skies, which are integral to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over extensive distances, is expected to create a pervasive and disruptive "wall of light" across the western horizon, thereby fundamentally transforming the night-time landscape.

Moreover, the application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly important given the role of dark skies in shaping the area's identity and its burgeoning tourism sectors, including astro-tourism. Consequently, this omission results in a clear deficiency in the overall landscape and environmental assessment.

Additionally, the application does not assess potential impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting due to their phototactic behaviour, which can result in disorientation and increased collision risk. The absence of a lighting impact assessment or a phototaxis study fails to address how the proposed aviation lighting may affect these species or contribute to increased mortality rates.

This oversight is exacerbated by the use of daytime survey data in the ornithological assessment, which does not adequately account for nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The failure to provide 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 is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not achieved, invoking the precautionary principle and thereby precluding a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4, which pertains to the safeguarding of natural environments and the quality of the environment. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a fundamental aspect of the overall ecological setting.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete, rendering it 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 outlined by statutory duties, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation were identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

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

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with negative impacts on tourism, would result in permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination.

The myriad of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I appreciate that we must look at alternative forms of energy for our future but this has to be balanced with other environmental factors such as visual impact and the potential detrimental effect on marine and other wildlife.

The west coast of the Western Isles is beautiful and largely unspoiled. Fewer places like this now exist. It should be kept like that, for people (both residents and visitors alike) to enjoy, in perpetuity, and to protect and preserve marine and other wildlife.

There must be more to saving the planet than investing in offshore wind farms. We need to look at the bigger picture and the benefits such unspoiled beauty can have, physically, emotionally and mentally.

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: B8CFE44D

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 application cannot be deemed to comply with the evidential threshold mandated under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation calls for the application of the precautionary principle, particularly concerning protected species and sensitive

habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity. It remains unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed subsequently obstructs any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation before determination.

Additionally, there are considerable evidential deficiencies present, such as gaps in baseline data and limitations in methodology, which are coupled with a reliance on assumptions instead of site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

The Environmental Impact Assessment Report is materially deficient, failing to furnish a full, transparent, or reliable account of the probable environmental effects of the proposal. The employment of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the process and inhibits a consistent application of a worst-case scenario. This undermines the integrity of the assessment and obscures the true extent of environmental effects, preventing both public understanding and competent authority assessment.

In summary, the combination of reliance on an undefined design envelope, absence of specific mitigation measures, and insufficient baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority incapable of determining the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development lacks reliability due to significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development risks displacement, collision, and habitat loss, yet these implications are not robustly evaluated.

A critical inconsistency arises within the application itself, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is applicable only when significant harm is anticipated. This

contradiction casts doubt on the assessment's reliability and raises questions about the support provided by the underlying evidence. Furthermore, the assessment fails to adequately 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 thoroughly considered, and the reliance on modelling approaches leads to uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed likely underestimate mortality, especially given incomplete baseline data and an insufficient understanding of behavioural responses.

Siting turbines within a recognised migratory corridor introduces further risk by creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary 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 necessitates the application of the precautionary principle, precluding a lawful conclusion in support of consent.

These deficiencies indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence prevent a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and causing a permanent and irreversible transformation of the landscape.

The application does not sufficiently represent the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and widely used coastal locations. This situation would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment fails to effectively convey the significance of these impacts in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests that the chosen viewpoints may not

adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Furthermore, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape setting by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated assets rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This signifies not just a visual impact but also a broader cultural and spatial harm that has not been adequately considered within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further calls into question any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbance and contamination. The proposed development involves significant seabed preparation and installation works in a challenging Atlantic environment. However, the assessment of construction and pollution risks lacks the necessary detail to effectively evaluate potential environmental impacts. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, which undermines any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming given the fragile nature of the receiving environment. The application notes the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to detail how these risks will be prevented, controlled, or monitored. There is also a lack of clarity concerning the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts, including those on already identified sensitive marine species and habitats.

Moreover, the absence of well-defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and limits the ability of the competent authority to properly assess environmental protection measures before a decision is made.

From a regulatory standpoint, the failure to establish essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and necessary mitigation must be evaluated before consent is granted, and the absence of such information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment related to fisheries and marine life fails to provide a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not convincingly demonstrate that these important uses and habitats can be safeguarded or maintained without considerable disruption.

A critical concern arises from the assumption that fishing activity can be displaced without any negative consequences. The application lacks evidence showing that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This significant omission risks the potential for overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain inadequately understood.

Moreover, the proposal introduces considerable risks to marine species, particularly

due to the underwater noise generated during construction. High-energy hammer piling conducted over an extended period is likely to disturb a wide range of marine life, including species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is alarming; however, the application seems to downplay the importance of these effects, lacking sufficient supporting evidence.

There is also a notable inconsistency within the application itself, where the necessity for licences to permit harm to European Protected Species is recognised, yet the impacts are simultaneously described as negligible. This contradiction severely undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application does not establish 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, obstructing any conclusion that the proposal can be considered sustainable development.

In conclusion, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies within the application render the assessment both incomplete and unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine life and fisheries.

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.

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: 065EC872

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is grounded in a comprehensive review of the Environmental Impact Assessment Report and its associated documentation, which reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, characterised by an Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise fundamental issues regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is noted that critical environmental data is absent, with baseline information being both limited and inconsistent. Key components of the proposal remain unclear, and the employment of a flexible design framework inhibits a precise understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects are unsupported by adequate evidence.

There exist pronounced and substantial conflicts with policy. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory assessments required for consent and weaken the capacity of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, providing an incomplete overview of the potential environmental consequences of the proposal. The flexible Project Design Envelope, which does not commit to fixed turbine dimensions, layouts, or configurations, creates considerable uncertainty. This variability hampers the ability to apply a worst-case scenario consistently, thus undermining the assessment's integrity. As a result, the impacts detailed may not accurately represent the development as it will be constructed, making it difficult for both the public and the competent authority to grasp the actual environmental implications.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later inhibits a thorough evaluation of the proposed measures' effectiveness and obscures the assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigation must be clearly delineated before any determination.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These gaps generate uncertainty concerning the magnitude and significance of impacts, especially when negligible or non-significant effects are claimed without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that contradicts statutory obligations.

Consequently, the application does not fulfil the evidential criteria stipulated under the Habitats Regulations, which are necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including the stipulations related to biodiversity protection and environmental integrity, as it fails to provide evidence that impacts have been thoroughly assessed or that adequate safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of concrete mitigation strategies, and the significant gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to offer a complete or dependable understanding of the ecological receptors

within the West Lewis coastal environment. This area is a sensitive and biologically rich marine system. However, the baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Particularly concerning is the neglect of otters, a species protected under European law, as the application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By overlooking their core foraging range and behavioural patterns, the assessment fails to consider the potential effects of construction disturbances, noise, and increased human activity. This oversight undermines any conclusions regarding the lack of significant effects on otters.

There are also considerable shortcomings in the evaluation of basking sharks, where reliance on aerial surveys introduces a significant detection bias, especially under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The disregard for such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. Furthermore, the lack of adequate baseline data hinders the meaningful assessment of cumulative and indirect impacts, which includes variations across seasons and broader ecosystem interactions. This lack of clarity creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating adherence to the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical issue that hampers a lawful evaluation of the proposed development. Although the developer engaged local residents through focus groups, the full report has not been released. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks highlighted in the

developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly, limiting the evaluation of their significance during the decision-making process.

Furthermore, there is an indication that the proposal threatens community identity and cohesion, with "cultural loss" identified in the developer's findings. Despite the seriousness of these impacts, they have not been adequately incorporated into the application, nor have they been given the appropriate consideration they warrant. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of disclosure also undermines the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is essential, particularly when community character and functionality are at stake. The absence of the complete dataset means the application does not present a full evidential basis necessary for weighing benefits against harms.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid detrimental effects; however, the available evidence points to existing adverse impacts that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural ramifications are considerable. 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 a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of current negative impacts, leads to an incomplete and unreliable assessment. This ultimately obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning the seascape, landscape, and visual impacts is significantly lacking, failing to capture the true extent of change and the sensitivity of the environment in question. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a

continuous and overwhelming industrial presence, which would drastically alter this character and lead to a permanent and irreversible transformation of the landscape.

Moreover, the application does not adequately reflect the scale of visual change that would ensue. Given their scale and proximity, the turbines would overshadow views from residential areas, historical sites, and popular coastal locations. This situation would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment falls short in conveying the true level of impact and its significance, particularly in such a sensitive landscape.

There are notable methodological shortcomings in the choice and presentation of visual viewpoints. Evidence indicates that some viewpoints do not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been minimised, thereby compromising the assessment's reliability.

Another critical shortcoming is the neglect to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these assets in isolation rather than acknowledging their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of change is inconsistent with the obligation to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy conformity.

It is evident that the impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The change resulting from this proposal is fundamental and permanent, rather than something that could 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 preservation of this landscape.

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.

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: 769CB055

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 issues obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes a development that poses risks to the west coast of the Isle of Lewis, a region supporting internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. It fails to convincingly demonstrate that these species will not be adversely affected, particularly as the development is situated within key foraging areas and migratory pathways. The assessment does not adequately evaluate critical factors such as displacement, collision risk, or habitat loss.

A fundamental contradiction arises within the application, as the developer asserts that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence presented. The assessment lacks sufficient proof that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, it does not adequately address the significance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds another considerable risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not accurately capture the scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would create a continuous and significant industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application falls short in conveying the magnitude of the visual change. Given their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently represent this level of impact or its significance in the context of such a sensitive landscape.

There are also concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming suggests that the magnitude of visual impact may be understated, undermining the reliability of the assessment.

A significant gap exists in the evaluation of the interconnected relationships among landscape, seascape, and cultural heritage. Prominent sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their relationship to the natural horizon. This represents 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 is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is also apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting change is fundamentally 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 reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to adequately evaluate the likely environmental impacts. The proposed development entails extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the application fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, which inhibits a meaningful evaluation of their sufficiency or effectiveness.

This reliance on undefined measures is particularly alarming considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disruption and pollution. While the application acknowledges the risks associated with sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are established to address pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot occur. Additionally, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of

comprehensive management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the current application does not adequately protect these vital habitats or activities, nor does it provide a thorough assessment of the ecological and socio-economic impacts.

A major concern is the assumption that fishing can be relocated without any negative effects. The application lacks evidence showing that alternative fishing grounds are available and can handle additional strain. This is a crucial gap, as displacing fishing activities could lead to overfishing in other areas and harm the local fishing economy. Without a solid, evidence-based evaluation, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposed development also poses serious risks to marine life, especially due to the underwater noise produced during construction. Extended periods of high-energy hammer piling are expected to disturb marine species over large distances, particularly dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise the importance of these disturbances without adequate supporting evidence.

There exists a clear contradiction within the application regarding the need for licenses to harm European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially when anticipated harm might necessitate legal permissions.

Furthermore, the assessment fails to address cumulative impacts that arise from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove adherence to the National Planning Framework 4 or the National Marine Plan. It falls short of demonstrating that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion regarding its sustainability.

In summary, the lack of evidence concerning fishing displacement, the downplay of acoustic impacts, and internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not fully address the impacts stemming from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is clear, yet these elements are evaluated in isolation, leading to a fragmented analysis that diminishes the understanding of the overall environmental and socio-economic implications.

Included in the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, which serves as an important carbon reservoir and an ecologically significant habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs the proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap concerning biodiversity protection.

The proposal further raises serious concerns regarding carbon balance. Disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and fails to show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure across active croft land presents potential conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the proposal.

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

In summary, the division of project components, the lack of a comprehensive

assessment, and the insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thus impeding lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, crucial for environmental quality, cultural identity, and tourism, particularly in the context of emerging sectors like astro-tourism. The proposed project introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

The application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors, despite the critical nature of dark skies to the area’s identity. This failure represents a notable gap in the overall landscape and environmental assessment.

Moreover, there is a lack of evaluation concerning the impacts 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 phototaxis, which can result in disorientation and a heightened risk of collision. The absence of a lighting impact assessment or phototaxis study means that potential effects on these species and their mortality rates have not been assessed.

This issue is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data creates a serious gap in understanding the ecological impacts.

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

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential part of the ecosystem.

Overall, the lack of evaluation concerning dark skies and nocturnal wildlife presents a considerable 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 stands as a clear failure to meet the standards of sustainable development, as established by statutory obligations, national policy, and evidential criteria. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A complete and reliable evidential basis for determining this application is lacking. There are significant gaps in baseline data, and the use of an undefined design envelope raises concerns. Additionally, the application relies on unspecified mitigation measures and fails to address critical impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects and residual impacts.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct opposition to National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It has not demonstrated that health and wellbeing impacts are acceptable, nor can it prove a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with

policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must refuse consent on these grounds or utilise relevant regulatory provisions to require the submission of the necessary missing information.

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

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: 96897CAE

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted within the relevant marine licensing and Environmental Impact Assessment frameworks. The development is situated off the west side of the Isle of Lewis, an area known for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal highlight its incompatibility with statutory requirements, national policy, and the principles of sustainable development.

The application presents significant deficiencies, particularly an inadequate evidential basis for lawful determination. Key environmental data is notably absent, while baseline information remains limited and inconsistent. Furthermore, many aspects of the proposal are not clearly defined. The use of a flexible design framework obscures a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation falls short of providing a complete understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by credible evidence.

Substantial policy conflicts are evident, as the proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural places, and health and wellbeing. It does not sufficiently demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity are achievable. These discrepancies directly challenge the statutory tests necessary for consent, undermining the competent authority's capacity to deem the development acceptable according to policy standards.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises significant worries about landscape capacity, visual dominance, and environmental consequences. Collectively, the insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application exhibits significant evidential deficiencies, highlighted by gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and

significance of impacts, particularly in instances where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to align with statutory requirements.

Moreover, the proposal does not adequately demonstrate compliance with National Planning Framework 4. The requirements related to biodiversity protection and environmental integrity cannot be satisfied as the assessment does not illustrate that impacts have been thoroughly examined or that necessary safeguards are established. The application seeks consent based on a reliance on unarticulated mitigation measures, monitoring strategies, and management plans that remain undefined. This approach results in an evaluation that is procedurally unacceptable, as it conflicts with the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly determined before a decision is made.

The Environmental Impact Assessment Report is materially deficient and fails to deliver a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The application's use of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, contributes to considerable uncertainty and hampers the consistent application of a worst-case scenario. This undermines the integrity of the assessment and precludes both the public and the competent authority from comprehending the true extent of environmental effects.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, ultimately leaving the competent authority unable to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

range and behavioural patterns, the potential effects of construction-related disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of ornithological impacts is fundamentally inadequate, presenting significant gaps in evidence and inconsistencies that compromise its conclusions. The application does not convincingly show that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will remain unaffected. The development site lies within critical foraging areas and migratory routes, yet fails to thoroughly assess the potential risks of displacement, collision, or habitat loss for these species.

A core contradiction arises within the application, as it asserts no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, a requirement that only emerges when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions lack

sufficient backing from the evidence provided.

Moreover, the evaluation does not adequately address the potential impacts on seabirds linked to protected sites, including the Lewis Peatlands and St Kilda. The significance of these feeding grounds has not been fully recognised, and the use of modelling methods introduces further uncertainty, particularly concerning species in critical decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the unclear understanding of species' behavioural responses.

The positioning of turbines within a designated migratory corridor presents a substantial risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of sustained mortality in this corridor and fails to assess the potential impacts 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 effects on the integrity of protected sites. The presence of contradictory findings, in conjunction with 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, undermining any lawful basis for consent.

Additionally, the identified shortcomings indicate a non-compliance with the National Planning Framework 4 regarding the protection of biodiversity and the preservation of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these elements as dynamic and living, the application treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice; however, the assessment erroneously categorises them as static entities, disregarding their continued relevance, significance, and the potential impacts of development on their surrounding environment. This

mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their importance in the lives of the community.

Moreover, the application neglects to assess intangible cultural heritage elements, such as the Gaelic language, traditions, and the established relationship between the community and the coastal landscape. These aspects are crucial to the area's identity but are completely absent from the assessment, marking a significant oversight. Without addressing these elements, it is impossible to gain a full understanding of the cultural implications of the proposed development.

There are additional concerns regarding the rights of the community and their engagement in this process. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established principles of participation in decisions that affect cultural and environmental matters.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal responsibilities in evaluating the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the preservation of historic assets and places. The disregard for both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a clear breach of policy mandates.

In summary, the neglect to properly assess living heritage, intangible cultural values, community rights, and statutory requirements results in a notable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not sufficiently support an understanding of the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing 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 of large-scale turbines close to the West Lewis coastline threatens to fundamentally alter the character of this sensitive environment. This area is characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. The introduction of such industrial structures would create a continuous and dominant presence along the shoreline, leading to a permanent and irreversible transformation of the landscape.

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations,

significantly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of 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 raises concerns that the potential visual impact has been underestimated, which undermines the reliability of the overall assessment.

Another critical gap is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their surroundings, with visual and spatial relationships tied to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete assessment of the impacts on their setting and cultural significance.

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

From a policy standpoint, this proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The anticipated scale of change contradicts the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further undermines any claims of compliance with policy.

The detrimental impacts identified cannot be adequately mitigated. The scale, height, and proximity of the turbines ensure their presence would be both dominant and unavoidable. Consequently, the change is fundamental and permanent, resistant to reduction through mitigation measures.

In conclusion, the assessment does not accurately represent the extent of the impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These inadequacies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal 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 within the application is incomplete and does not adequately evaluate the ecological or socio-economic impacts. The waters near the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not demonstrate that these habitats and uses can be protected without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without negative effects. The application fails to provide evidence that alternative fishing

grounds are available or can support the added pressure from displaced fishing. This lack of information is crucial, as such displacement could lead to overfishing in other areas and negatively impact the local fishing fleet's economy. Without a thorough and evidence-based evaluation, the effects on fisheries and livelihoods remain unclear.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, impacting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the significance of these impacts without adequate supporting evidence.

There is a notable contradiction within the application; it acknowledges the need for licences to harm European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

Moreover, the assessment does not address the cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. However, the Environmental Impact Assessment fails to include any assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of analysis is particularly concerning as dark skies are important to the area's identity and

emerging tourism sectors, such as astro-tourism. The resulting gap in the overall landscape and environmental assessment is clear.

Moreover, there is no consideration of the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting, which can lead to disorientation and a higher risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not assess how aviation lighting might impact these species or contribute to increased mortality rates.

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

Without an assessment of nocturnal impacts, it is impossible to determine if protected species or designated sites would suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. This lack of analysis also undermines the broader assessment of landscape and seascape impacts, as night-time character is a crucial element of the environment.

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

SUMMARY

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

There are significant gaps in the baseline data, an undefined design envelope is used, unspecified mitigation measures are relied upon, and crucial impact pathways are omitted. These include considerations for nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not sufficiently demonstrate protection of biodiversity, natural places, and cultural heritage. It fails to indicate acceptable health and wellbeing impacts and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been adequately evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion about the acceptability of impacts.

Additionally, the proposal would cause 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 the impacts on tourism represent lasting effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to obtain the missing information.

Therefore, 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: 46CD867A

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. A thorough review of the Environmental Impact Assessment Report and its accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The concerns surrounding the scale, proximity, and design of this proposal fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application is critically lacking in an evidential basis necessary for lawful determination. There is a troubling absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined, hindering any clear understanding of the likely significant effects. Furthermore, the use of a flexible design framework complicates the assessment, and the unspecified mitigation measures mean their potential effectiveness remains unknown. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are also evident. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, jeopardising the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The unprecedented scale of this proposal introduces additional concerns, with large turbines situated in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall 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 incapable of supporting a lawful determination. Given these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed, as it heavily relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent on the premise that environmental harm will be managed later undermines the ability to evaluate the effectiveness of these measures or to assess the residual impacts of the proposal. This postponement of crucial information until after consent is granted is not only procedurally unacceptable but also runs counter to the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and their mitigations should be established clearly before any determination.

Additionally, the Environmental Impact Assessment Report is materially deficient and fails to present a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without specific commitments to turbine dimensions, layouts, or configurations, adds substantial uncertainty. This lack of specificity hinders a consistent assessment of a worst-case scenario, thereby undermining the integrity of the evaluation process. As a result, the impacts outlined may not accurately reflect the actual development that would be constructed, leaving both the public and the competent authority in the dark regarding the true extent of the environmental effects.

There are also significant evidential deficiencies present, including gaps in baseline data and methodological limitations, which lead to a reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty surrounding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The inadequate information provided prevents a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Due to these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. The precautionary principle must be applied, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards are established.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the proposed development is seriously flawed. It does not offer a complete understanding

of the ecological receptors in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is lacking. The methods employed do not adequately capture the presence, behaviour, or habitat use of species in the region. Consequently, the assessment fails to provide a sound basis for evaluating the potential impacts of the project.

There is a significant oversight concerning otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behaviour means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines any conclusions about the absence of significant effects on this species.

The assessment also falls short in evaluating basking sharks. The reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The omission of such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings imply that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been appropriately identified or assessed. The uncertainty introduced by these deficiencies prevents the conclusion of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be lawful.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on ornithology is fundamentally flawed, characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Notably, the development is located within crucial foraging areas and migratory pathways. However, the assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss on seabird

populations, which are already in decline, particularly along the west coast of the Isle of Lewis, known for its internationally important seabird populations.

There exists a critical inconsistency in the application, where the developer claims no significant adverse effects while also pursuing a Habitats Regulations derogation case. This is only necessary when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that the conclusions drawn are not sufficiently supported by evidence. The application does not provide adequate evidence regarding the protection of seabirds associated with sites such as the Lewis Peatlands and St Kilda. The assessment inadequately considers the importance of these feeding grounds, relying on modelling techniques that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. Such methodologies likely underestimate mortality risks, especially given the incomplete baseline data and unclear behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant risk by acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality within this corridor, as well as the potential impacts on species with relatively small global populations, are not sufficiently assessed in the application.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, these deficiencies indicate a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and safeguarding 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, these combined shortcomings result in an unreliable assessment due to internal inconsistencies, methodological weaknesses, and inadequate evidence. Such deficiencies impede a robust evaluation of the impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is alarmingly inadequate, notably failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application employs a reductive method, viewing heritage merely as a collection of isolated, static entities instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Particularly troubling is the treatment of culturally significant sites like the cemeteries

at Dalmore, Bragar, and Barvas. These sites remain active places for burial and spiritual practices, yet they are mischaracterised as static features, ignoring their continued significance and the implications of development on their settings. This fundamental misunderstanding leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, there is a glaring omission in the consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity yet are completely overlooked in the assessment. This oversight prevents a comprehensive understanding of the cultural impacts stemming from the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a unique cultural identity and bears characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and overlooks established principles of participation in matters affecting cultural and environmental interests.

A significant procedural shortcoming is the absence of a valid 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 analyse the social, cultural, and economic impacts on the island community. This single omission renders the determination process unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The failure to incorporate both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear violation of policy mandates.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural implications of the proposed development have not been adequately examined, and the application falls short of providing a solid foundation for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of this situation 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 omission within the application indicates a failure to meet the evidential standards required under the Environmental Impact Assessment regime.

Moreover, there is a significant deficiency in the assessment of social impacts, health, and wellbeing, which lacks the transparency needed for a lawful evaluation. The

developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This creates a considerable evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are therefore not speculative in nature. Nonetheless, the failure to disclose the complete assessment obstructs proper examination of the findings and restricts the capacity to ascertain their significance in the decision-making process.

In addition, the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” acknowledged in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly in relation to potential effects on community character and functionality. By failing to provide the complete dataset, the application does not offer a sufficient evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the evidence currently available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

In conclusion, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and reinforces the assertion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed turbines is fundamentally inadequate, failing to recognise the profound scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which are threatened by the introduction of large-scale turbines situated near the shoreline. Such an industrial presence would significantly alter the character of the area, leading to a permanent

transformation of the landscape.

Furthermore, the application lacks a thorough representation of the extent of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly compromising visual amenity and undermining the essential qualities of naturalness and remoteness. This critical impact is not sufficiently conveyed within the assessment, which diminishes the significance of these changes in a sensitive landscape context.

Concerns regarding the methodology used to select and present visual viewpoints also arise, as evidence indicates that certain viewpoints may fail to capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been minimised, thus calling into question the reliability of the assessment.

Moreover, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, which obscures their interdependence and leads to an incomplete evaluation of impacts on their setting and cultural value.

The industrialisation of the seascape would sever the critical connections that enable the appreciation of these heritage sites, altering the context in which they are experienced and disrupting their relationship with the natural horizon. This signifies not only a visual impact but also a deeper cultural and spatial detriment that has not been comprehensively evaluated within the application.

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

Lastly, it is evident that the impacts outlined in the proposal cannot be effectively mitigated. Due to the dimensions, height, and closeness of the turbines, their presence would be overpowering and unavoidable, resulting in a fundamental and lasting change that cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately portrays the scale of impact, overlooks the sensitivity of the environment, and fails to recognise the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the assertion that the proposal is incompatible with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in its assessment of construction and pollution risks, failing to offer the necessary detail for evaluating potential environmental effects. It entails considerable seabed preparation and installation work in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the proposal relies on mitigation and contingency measures that will be formulated post-consent, thus obstructing any meaningful assessment of their adequacy or effectiveness.

The absence of defined future measures is particularly alarming, especially given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to disturbances and contamination from sediment. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it does not provide adequate detail on prevention, control, or monitoring strategies.

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also pertains to the potential effects on sensitive marine species and habitats identified in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By delaying contingency planning until after consent has been granted, the application hinders the evaluation of whether proper safeguards are in place to address pollution incidents. This approach introduces procedural risks and compromises the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to granting consent, and the absence of such critical information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposed development presents significant concerns regarding its assessment of fisheries and marine life, which is inadequate and fails to offer a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are

home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without experiencing considerable disruption.

A major issue arises from the presumption that fishing activities can be relocated without repercussions. There is no evidence provided to suggest that alternative fishing grounds are available or suitable to absorb the additional pressure that would result from this displacement. This lack of information is critical, as the risk of overfishing in other areas is heightened, potentially leading to wider economic repercussions for the local fishing fleet. The absence of a clear and evidence-backed assessment obscures the understanding of impacts on both fisheries and local livelihoods.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to create disturbances that reach large distances, which may adversely affect species such as dolphins. The predicted disruption to a considerable portion of the local bottlenose dolphin population raises profound concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Additionally, the application exhibits a notable inconsistency by acknowledging the requirement for licences to permit harm to European Protected Species, while simultaneously claiming that such impacts are negligible. This contradiction undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

The assessment also neglects to consider the cumulative impacts from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions lead to an assessment that is incomplete and unreliable. These issues impede a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally flawed and does not account for the full range of impacts stemming from what constitutes a single

integrated project. The offshore turbines are intrinsically connected to the onshore works, yet the assessment treats them separately, leading to a disjointed approach that conceals the true extent of environmental and socio-economic consequences.

The proposed onshore elements involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure traversing sensitive landscapes. These activities entail excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which obstructs a complete understanding of the project's overall environmental footprint.

Moreover, the application excludes a comprehensive evaluation of onshore impacts, hindering the proper assessment of cumulative effects. The Environmental Impact Assessment framework necessitates that all parts of a project be considered collectively; however, the disjunction between offshore and onshore components results in an insufficient understanding of combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed, nor does it show that appropriate avoidance measures have been enacted, creating a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also paramount. Disturbing peatland releases sequestered carbon, which could lead to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been pursued, casting doubt on its deliverability and legal viability.

From a policy standpoint, the failure to evaluate the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further erodes the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a substantial gap within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The proposal, which includes the introduction of permanent red aviation lighting, would create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is critical, given the significance of dark skies to the community's identity and emerging sectors like astro-tourism. The absence of consideration for these impacts creates a notable deficiency in the overall landscape and environmental assessment.

Additionally, there is no analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and heighten the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to examine how the proposed aviation lighting may affect these species or lead to increased mortality rates.

The situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of specific night-time data signifies a crucial gap in understanding the ecological implications.

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

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4 concerning the protection of natural environments and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts since the character of the night-time environment is an integral component of the ecosystem.

In summary, the failure to address dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of 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.

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: 39DE2557

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 appropriate marine licensing and Environmental Impact Assessment frameworks. The objection stems from a thorough review of the Environmental Impact Assessment Report and related documents, which reveal significant deficiencies across various domains including planning, environmental considerations, cultural implications, and procedural integrity. The development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale and proximity of the proposed development raise serious questions regarding its alignment with statutory requirements, national policy, and the tenets of sustainable development. Central to this objection is the assertion that the application lacks a sufficient evidential basis necessary for lawful approval. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, several key aspects of the proposal remain undefined. The flexible design framework employed complicates the assessment of likely significant effects, and the proposed mitigation measures, which have not yet been specified, inhibit the evaluation of their potential effectiveness. Consequently, the available documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, thereby undermining claims of negligible or non-significant effects that lack robust evidential support.

There are evident and substantial conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, address climate considerations, and uphold environmental integrity. Such conflicts are critical to the statutory tests necessary for securing consent and impede the competent authority's ability to ascertain the development's acceptability within policy frameworks.

The scale of the proposed development is without precedent in this area, featuring large turbines located close to the shoreline. This raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations illustrate that the application is fundamentally incomplete and incapable of supporting a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and lacks a full and reliable account of the potential environmental effects of the proposal. There is significant uncertainty due to the use of a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This lack of specificity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts described may not accurately reflect the final development, which hinders both public understanding and the competent authority's ability to grasp the actual environmental effects.

The application places considerable reliance on mitigation measures, management plans, and monitoring strategies that remain undefined. As a result, consent is sought with the expectation that environmental harm will be managed at a later date. This approach prevents a meaningful evaluation of how effective these measures will be and hampers the assessment of any residual impacts. Deferring essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable deficiencies in evidence, including gaps in baseline data and limitations in methodology, which lead to reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are claimed without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards outlined in the Habitats Regulations, which necessitate excluding adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it does not adequately demonstrate that impacts have been fully assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and

biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 issues obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development reveals significant flaws, undermining its credibility. There are substantial gaps in the evidence and internal inconsistencies that raise serious questions about its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already

declining. However, the application does not provide the necessary evidence to demonstrate that these species will not be adversely affected. The development site is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also putting forth a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not adequately recognised, and the reliance on modelling methods introduces further uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully considered.

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

Regulatory concerns emerge as the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition,

and community are interconnected. The evaluation adopts a narrow perspective, viewing heritage merely as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practice; however, they have been classified as static features within the assessment. This mischaracterisation neglects their continued use and meaning, as well as the effects of development on their settings, leading to an incomplete analysis of cultural impacts and overlooking their role in community life.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity and are conspicuously missing from the assessment, constituting a major oversight. The failure to consider these factors inhibits a comprehensive understanding of the development's cultural impact.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity recognised as that of an Indigenous People. However, the absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and disregards established principles for participation in decisions that affect cultural and environmental matters.

A significant procedural error is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic repercussions on the island community. This alone compromises the legality of the determination process.

From a policy standpoint, these deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices represent a clear deviation from the stipulated policy requirements.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory responsibilities culminates in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not offer a sufficient foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and hampers the assessment of their importance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and its undeveloped nature, evoking a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts in the application is materially deficient, failing to adequately represent the scale of change or the sensitivity of this unique environment. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not fully capture the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment inadequately conveys this level of impact and its significance within such a sensitive landscape.

Methodological issues are evident regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This risk of understatement undermines the reliability of the visual impact assessment.

A significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Iconic 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 recognising their interdependence, the assessment treats these assets in isolation, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, changing 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 in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the absence of a robust worst-case scenario assessment further undermines any claims of compliance with relevant policy.

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

In summary, the assessment fails to accurately represent the extent 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 valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks presented in this application is significantly lacking and fails to deliver the necessary detail for a thorough assessment of potential environmental impacts. Involvement in extensive seabed preparation and installation activities in a high-energy Atlantic setting is proposed, yet there are no well-defined Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application leans on mitigation and contingency strategies that are intended to be formulated after consent has been granted, inhibiting a genuine appraisal of their potential effectiveness or adequacy.

This dependency on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are sensitive to disturbances from sediment and contamination. Although the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide ample detail on preventative, control, or monitoring strategies.

There is also considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly established management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats recognised as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent can be granted, and in the absence of this information, a lawful determination is unattainable. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation strategies, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is insufficient and does not provide a robust evaluation of ecological or socio-economic impacts. A critical concern is the flawed assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This oversight is significant as it risks overfishing in other areas and could lead to broader economic repercussions for the local fleet. The lack of a clear and evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal introduces considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to disturb a wide range of marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the significance of these effects without providing sufficient supporting evidence.

Inconsistencies within the application are also notable. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation. Furthermore, the assessment does not take into account cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be properly determined.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal reflects sustainable development. In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application echoes the central issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. The

current proposal is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for proper determination of the application. It lacks complete baseline data and relies on an undefined design envelope. Moreover, it depends on unspecified mitigation measures and omits crucial impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are evident in this proposal. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and failing to present a complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. There is insufficient evidence of acceptable health and wellbeing impacts, and the absence of tourism impact modelling fails to establish a net economic benefit. The cumulative impacts of offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain regarding environmental risks. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which prevents a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, disrupt dark skies, and affect cultural and visual relationships, along with tourism impacts. These represent permanent effects that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination, both procedurally and substantively. The considerable deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or invoke relevant regulatory provisions to obtain 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: B1C3BFA9

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documentation, highlighting significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and overall design, which may not align with statutory requirements, national policies, or the tenets of sustainable development.

The application is deficient in providing an adequate factual basis for a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal remain unclear. The flexible design framework utilised creates challenges in comprehending potential significant effects, while the dependence on unspecified mitigation strategies means that their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a comprehensive or informed understanding of the environmental, cultural, or community ramifications, with assertions of negligible or non-significant effects lacking robust evidential support.

Substantial policy inconsistencies are evident. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national mandates to safeguard biodiversity, address climate concerns, and maintain environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the capability of the competent authority to ascertain the development's acceptability under policy frameworks.

The proposal's unprecedented scale at this location, with large turbines placed near the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental consequences. Together, the lack of comprehensive information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy violations suggest that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The 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 proposed application does not provide an adequate assessment of alternatives, failing to meet the requirements set by the Environmental Impact Assessment regime.

Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, it presents a narrative that describes the project's development. This method does not show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and evidence in the comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously considered placing turbines further offshore, which could reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

These shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence of proper exploration of alternative routes to avoid or minimise impacts on sensitive receptors. This includes important areas like Barvas Cemetery, which have cultural and spiritual significance. The absence of a clear strategy to avoid impacts and the lack of comparative analysis suggest that mitigation by design has not been applied, with reliance instead on post-design mitigation measures.

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

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is insufficient and fails to deliver a thorough and dependable understanding of ecological receptors. This marine system is both biologically active and sensitive, yet the baseline data remains incomplete, while the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for the evaluation of impacts.

Significant shortcomings pertain to otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The omission of their core foraging range and

behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently examined. This gap undermines any conclusions regarding the lack of significant effects on this species.

Deficiencies are also evident in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly account for such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been thoroughly identified or evaluated. The uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is significantly flawed, containing substantial gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations that are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, as required by the relevant evidential standards. The turbines are sited within vital foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate potential risks, including displacement, collision, and habitat loss.

There is a notable contradiction in the application where the developer asserts that there are no significant adverse effects, while also submitting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the

assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches adds uncertainty, particularly for species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor presents an additional and serious risk, potentially obstructing a primary flight path utilised 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 impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes 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 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

Collectively, these issues render the assessment unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the potential impacts and lead to the overall conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of publication of the full Social Impact Assessment is a critical issue that has significant implications for the evaluation of this development proposal. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the identified social risks.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community, making them grounded in reality rather than speculative. However, without access to the full assessment, proper scrutiny of these findings is impossible, thus limiting the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Nonetheless, these serious concerns have not been adequately integrated into the main application or given appropriate consideration. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing the benefits against the potential harms.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a rigorous socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, renders the assessment inadequate and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposal is severely lacking and does not sufficiently capture the scale of change or the sensitivity of the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and significant remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately reflect the magnitude of visual change anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Such an impact would directly affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not convey the extent of this impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints might not

adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of an assessment of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

Collectively, these deficiencies prevent a reliable evaluation of the proposal and reinforce the conclusion that it is incompatible with the protection of this landscape. The assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage.

CONSTRUCTION AND POLLUTION RISKS

The proposal requires extensive seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is especially alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and

contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the methods to prevent, control, or monitor these occurrences.

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

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the time of determination.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the current application fails to adequately assess the ecological and socio-economic impacts associated with the proposed development. A significant concern is the assumption that fishing activities can be relocated without negative consequences. The lack of evidence supporting the availability of alternative fishing grounds that are both accessible and capable of handling increased pressure is troubling. This omission poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial threats to marine species due to underwater noise during construction activities. The extended use of high-energy hammer piling is expected to create disturbances across considerable distances,

impacting species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population raises critical issues, yet the application minimises these effects without providing adequate supporting evidence.

The application also contains inconsistencies, particularly regarding the need for licences to authorise harm to European Protected Species, while simultaneously declaring such impacts as negligible. This contradiction raises doubts about the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially when harm is expected to a level that necessitates legal approval.

Moreover, the evaluation neglects to account for cumulative impacts resulting from various pressures, including habitat disruption, noise, and fishing displacement. The absence of a detailed examination of these interconnected effects hinders the ability to assess the overall consequences on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not sufficiently illustrate how the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby challenging the conclusion that this proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment render it incomplete and untrustworthy. These shortcomings preclude a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant concerns regarding the assessment of onshore infrastructure, which is incomplete and does not fully account for the impacts of this integrated project. The offshore turbines are closely connected to the onshore works, yet they have been evaluated separately, resulting in a fragmented approach. This separation obscures the understanding of the true scale of environmental and socio-economic effects.

Key elements of the onshore works involve cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities entail excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically delicate habitat. The lack of a thorough assessment of these impacts limits the ability to grasp the overall environmental footprint of the project.

Additionally, by deferring or excluding the evaluation of onshore impacts, the application fails to allow for a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered

collectively, yet the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately addressed.

The risks to sensitive habitats such as machair systems and peatland environments are significant, as these areas are subject to policy protection. The proposal does not convincingly show that it has fully assessed the impacts on these habitats or applied the necessary avoidance measures, creating a clear gap in evidence related to biodiversity protection.

Concerns also arise regarding the carbon balance as disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application fails to sufficiently address this issue or to confirm that the overall carbon balance remains favourable.

Furthermore, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the requisite consents or processes have been initiated, which raises doubts about the deliverability and legal implementation of the project.

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

In conclusion, the separation of project components, along with the absence of a comprehensive assessment and insufficient evidence regarding environmental and land use impacts, renders this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife is a significant gap in the Environmental Impact Assessment, which has serious implications for the proposal. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly troubling given the significance of dark skies to the identity of the region and the emergence of tourism sectors such as astro-tourism. The lack of consideration for these impacts indicates a clear deficiency in the overall landscape and environmental assessment.

More critically, there has been no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there has been no evaluation of how aviation lighting may affect these species or contribute to their mortality.

This lack of assessment is exacerbated by the use of daytime survey data in the ornithological evaluation, which fails to capture nocturnal activities or related risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has gone unassessed. The failure to provide site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to exclude potential adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of any assessment related to dark skies and nocturnal wildlife presents a substantial evidential void. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of underpinning a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. It shares significant issues with the 2008 Lewis Wind Power proposal, which was rejected due to unacceptable industrialisation. Now, it is put forward under a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis. There are serious gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are clear procedural shortcomings as well. The lack of a compliant Island

Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal contradicts National Planning Framework 4. It does not demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 5FB3360B

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.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, exhibiting gaps in evidence and inconsistencies that diminish its conclusions. The west

coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Situated within crucial foraging areas and migratory pathways, the proposed development does not adequately assess the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the supporting evidence. The assessment lacks sufficient information to conclude that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling techniques adds a layer of uncertainty, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor introduces a significant risk by 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 consequences of ongoing mortality within this corridor or the potential impacts on species with small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape in which the environment, language, traditions, and community are

deeply interconnected. The approach taken reduces heritage to a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas exemplify a significant oversight. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features, with the assessment disregarding their continued use, significance, and the potential impacts of development on their settings. This misunderstanding leads to an incomplete evaluation of cultural effects and overlooks their integral role in community life.

Moreover, there is a troubling absence of consideration for intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These elements are pivotal to the area's identity but are entirely neglected in the assessment, indicating a substantial gap in understanding the cultural impact of the proposed development.

The application also demonstrates a lack of engagement with community rights, particularly regarding the Gaelic-speaking population, which possesses distinct cultural identity characteristics recognised as those of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises concerns about the legitimacy of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

A further procedural shortcoming is the failure to provide 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, rendering any determination unlawful.

From a policy standpoint, these inadequacies position the proposal in direct contradiction to the National Planning Framework 4, especially concerning the preservation of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices signify a clear violation of policy requirements.

In conclusion, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a sufficient basis to assess 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 had its full report published. This lack of disclosure represents a significant evidential gap that impedes both the public and the competent

authority from comprehending the complete range of social risks uncovered by the developer's own research. Without access to the full assessment, the ability to properly scrutinise the findings is severely limited, thereby obstructing the assessment of their significance in the decision-making process.

Residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement with the community and are therefore not speculative. Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with the developer's findings noting a "cultural loss." Despite the gravity of these issues, they have not been adequately incorporated into the main application or given the appropriate consideration they warrant.

The failure to publish the full Social Impact Assessment obscures the true human and social costs of the development, undermining the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. By withholding the complete dataset, the application fails to provide a robust evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet existing adverse effects have not been fully disclosed in the available evidence. Consequently, without the complete assessment, adherence to this policy cannot be verified.

The procedural implications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material flaw within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment framework. Overall, the combination of not disclosing the full Social Impact Assessment and the evidence of existing adverse impacts renders the evaluation incomplete and unreliable, hindering a lawful determination and reinforcing the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding the impacts on seascape, landscape, and visual aspects is significantly inadequate, failing to accurately depict both the extent of the changes and the sensitivity of the environment being affected. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shoreline would introduce a continuous and prominent industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application does not sufficiently convey the magnitude of the visual changes anticipated. The turbines' scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thus directly affecting visual amenity and diminishing the fundamental qualities of naturalness and remoteness. The current assessment fails to accurately reflect this level of impact or its significance within the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and landscapes of high value. This suggests that the scale of visual impact may have been understated, calling into question the assessment's reliability.

Another critical shortcoming is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated, failing to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The magnitude of change is at odds with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Thus, the resulting change is fundamentally permanent and not susceptible to reduction to an acceptable level through mitigation.

In summary, the assessment does not accurately reflect the extent of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is notably inadequate. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided, resulting in a reliance on mitigation and contingency measures that are to be formulated after consent. This reliance raises serious concerns, as it hampers any meaningful evaluation of their adequacy or effectiveness.

The application acknowledges potential risks, such as sediment mobilisation and accidental chemical or oil spills, but fails to offer sufficient detail on prevention, control, or monitoring strategies. Additionally, there is ambiguity concerning the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty extends to the marine species and habitats that have already been identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the assessment of whether suitable safeguards exist to address pollution events. This not only introduces procedural risk but also undermines the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigations must be evaluated prior to granting consent, and the absence of critical information renders a lawful determination impossible. 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 make the assessment materially deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. It fails to demonstrate that these critical uses and habitats can be safeguarded without substantial disruption.

One major concern is the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence indicating that there are alternative fishing grounds that are accessible and able to bear the additional pressure. This gap in information is crucial, as the potential for displacement risks overfishing in other areas, which could lead to broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Furthermore, the proposal presents significant risks to marine species, particularly due to underwater noise created during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine life across considerable distances, notably affecting species such as dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is alarming; nonetheless, the application minimizes the importance of these effects without adequate evidence to support such claims.

There is a clear contradiction within the application regarding the requirement for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This inconsistency undermines the assessment's credibility and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal is sustainable.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

A more pressing concern is the absence of analysis regarding the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment for lighting or a study on phototaxis, thus neglecting the potential effects of aviation lighting on these species and their mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. They also undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife presents a substantial evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and inadequate for supporting a lawful decision.

TOURISM

The evaluation of tourism impacts is critically inadequate, neglecting to assess the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen substantial growth, with income rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not address how the industrialisation of the seascape and the resultant loss of environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in the understanding of impacts on a recognised and growing segment of the local economy.

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

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

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminates in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

A critical examination of the application reveals significant deficiencies in the evidential basis necessary for determination. There are notable gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the exclusion of essential impact pathways such as those affecting nocturnal wildlife, comprehensive

onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of likely significant effects or residual impacts.

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

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

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

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

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

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

Additional Comments

Whilst I support the use of renewable energy as it's our only long-term solution for the planet, the continued exploitation of Scottish land and waters for unneeded additional generating capacity within a Scottish context is unconscionable. Scotland already produces more than 100% of its energy requirement, and whilst I am cognisant that the UK grid is below this figure, the burden of hosting additional generating capacity should fall closer to those in need.

In addition, we are seeing repeated instances of economic colonisation of Scotland, with profits primarily benefiting foreign-owned companies and foreign governments. Local communities get measly scraps from the top table, and all the while our energy bills are getting more onerous. Our land and water is treated as a mere economic resource to enable corporations and foreign governments to parasitically bleed us dry, while fuel poverty increases near windfarms such as the one that is proposed.

People come to our islands because they prize the peace, the quiet, and the landscape. All three of these valuable assets will be adversely affected by these oversized and unnecessary wind turbines. If this windfarm is approved, we'd effectively be selling off the family silver for a pittance. The value of our environment needs to be factored into the economic case for any such development, but since protecting and preserving our landscape doesn't provide profits for any corporations, it doesn't seem to count. It's time a stand was made for our people, our wildlife, and our environment.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2F6B01C7

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

Dear Sir/Madam

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

Fundamentally, the application lacks a sufficient evidential basis to support a lawful determination. There are critical gaps in environmental data, with baseline information proving limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their 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 are not backed by adequate evidence.

The proposal presents clear and substantial conflicts with 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. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These policy conflicts directly affect the statutory tests required for consent and weaken the ability of the competent authority to determine that the development is acceptable from a policy perspective.

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 environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal for the development is underpinned by an Environmental Impact Assessment Report that is fundamentally flawed, failing to deliver a full, transparent, or reliable account of the potential environmental impacts. The introduction of a flexible Project Design Envelope, which lacks defined turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This ambiguity hampers the ability to apply a consistent worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true environmental effects. Consequently, both the public and the competent authority are left without a clear understanding of the possible impacts from the development ultimately constructed.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the basis that environmental harm will be mitigated later undermines the potential for a meaningful evaluation of effectiveness and leaves residual impacts unassessed. This deferment of essential information to post-consent phases is procedurally improper and contradicts the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures must be clearly established prior to any determination.

There are substantial evidential shortcomings within the assessment, including gaps in baseline data and methodological limitations. The reliance on assumptions rather than site-specific evidence leads to uncertainty regarding the extent and significance of impacts. This is particularly concerning when conclusions regarding negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information inhibits a thorough understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that adequate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of the environmental effects, leaving the competent authority unable to make an informed determination based on the information currently available.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a lawful evaluation. A Social Impact

Assessment was commissioned by the developer, which included focus groups with local residents; however, the comprehensive report has not been made available. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks highlighted by the developer's own research.

Evidence suggests that local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are not conjectural. Nonetheless, the absence of the full assessment restricts proper scrutiny of these findings, thus impairing the capacity to assess their significance in the decision-making process.

Additionally, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The non-disclosure of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when there may be effects on community character and functionality. The failure to provide the complete dataset means the application does not offer a solid evidential foundation for evaluating the balance between benefits and detriments.

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

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a significant omission in the application, representing a failure to satisfy the evidential standards of the Environmental Impact Assessment regime.

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

FISHERIES AND MARINE LIFE

The proposal lacks a robust assessment of fisheries and marine life, failing to adequately evaluate the ecological and socio-economic impacts associated with the

development. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a functioning fishing industry; however, the application does not provide assurance that these habitats and uses will be protected or maintained without significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available or capable of sustaining the additional pressure resulting from such displacement. This oversight is particularly concerning, as it poses a risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species, primarily due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended period is likely to cause disturbance across considerable distances, thereby affecting species including dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises critical concerns, yet the application minimises these effects without sufficient supporting evidence.

Additionally, the application demonstrates a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly where harm is anticipated to the extent requiring legal authorisation.

Moreover, the assessment does not take into account the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

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

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

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

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

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

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

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

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

Additional Comments

The research for this project has not been adequately done and directly affect the local marine wildlife as well as the local communities who live near by

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: FECAE555

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis to support a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and several key aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework obstructs a clear understanding of the likely significant effects of the development. The reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the potential environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests required for consent and compromise the competent authority's ability to conclude that the development is acceptable within a policy context.

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant deficiencies in the Environmental Impact Assessment Report, which fails to provide a comprehensive and reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, lacking definitive turbine dimensions and configurations, creates considerable uncertainty and undermines the ability to apply a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development, thereby obstructing the public and the competent authority from grasping the true environmental consequences.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hampers any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's intent, which necessitates that significant effects and mitigation measures are explicitly established before determination.

There are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Consequently, there is ambiguity surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is not reconcilable with statutory obligations.

Consequently, 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, which encompasses requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are implemented.

Collectively, the dependence on an ambiguous design envelope, the lack of specified mitigation measures, and the deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, which fails to align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned evaluation of

feasible alternatives based on their environmental impacts, it provides a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been effectively identified, assessed, and selected over more damaging solutions.

There is a lack of transparent, evidence-based comparisons between alternative offshore locations, development scales, or design configurations. Notably, the developer has not sufficiently explored the possibility of placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be reduced. Given the sensitivity of the West Lewis coastline, along with the critical role that proximity to shore plays in determining impact, the failure to include such an analysis renders it impossible to ascertain whether the proposed siting is indeed the least damaging option.

These deficiencies also apply to the cable routing and landfall assessment, where evidence is insufficient to prove that alternative routes have been adequately considered to avoid or reduce impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy, which inhibits the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies severely undermine compliance with National Planning Framework 4, particularly regarding the protection of natural spaces, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a material flaw that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is recognised as a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete and reliable understanding of ecological receptors in this area. The baseline data is incomplete, and the methodologies applied do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a sound evidential basis for evaluating impacts.

One significant oversight is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are inadequately evaluated. This gap undermines any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks also reveals further deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate their presence, especially in comparison to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and further weakens the reliability of the conclusions presented.

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

From a regulatory perspective, the application does not meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these conditions, 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 conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings, characterised by internal inconsistencies and gaps in evidence that undermine its findings. The application does not sufficiently demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected by the proposed development. Key foraging areas and migratory pathways are situated within the development site, yet there is inadequate evaluation of the potential implications related to displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there will be no significant adverse effects, while also proposing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment.

and suggests that the conclusions drawn lack support from reliable evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not thoroughly examined, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed may likely underestimate mortality, especially given the incomplete baseline data and limited understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, essentially creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor and the potential effects on species with relatively small global populations have not been adequately assessed. From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the assessment does not achieve the standard of proof beyond reasonable scientific doubt. This situation engages the precautionary principle, resulting in an unlawful conclusion regarding consent.

In addition, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction with national policy. Collectively, these factors contribute to the assessment being unreliable, primarily due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. Consequently, these shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a dynamic cultural landscape, where the intertwined elements of environment, language, tradition, and community play a vital role in shaping local identity. However, the assessment of cultural heritage and community identity is fundamentally inadequate, treating heritage as a collection of isolated, static assets without acknowledging their ongoing significance within the community.

There are particular concerns regarding culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places of burial and spiritual practice. Unfortunately, the assessment fails to recognise their continued use and the implications of development on their surroundings, resulting in an incomplete evaluation of cultural effects and neglecting their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language and traditions that define the community's relationship with the coastal

environment. These aspects are crucial to local identity yet are entirely omitted from the analysis, leaving a significant gap in understanding the cultural impact of the development.

The lack of engagement with the Gaelic-speaking population, who possess a distinct cultural identity akin to that of an Indigenous People, raises further issues. The absence of a process for Free, Prior and Informed Consent undermines the credibility of the assessment, failing to uphold the principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, hindering lawful determination of the proposal.

From a policy standpoint, these shortcomings conflict with the National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the disregard for living cultural practices, reflects a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application lacks a sufficient basis for understanding its true cultural cost.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment creates a significant evidential gap, which hampers the ability of both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research. While a Social Impact Assessment was commissioned and included focus groups with local residents, the absence of the full report restricts proper scrutiny of its findings. Summaries suggest that residents are already experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are not speculative; they stem from direct engagement with the community.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application or given appropriate consideration. The lack of transparency in withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency undermines the Environmental Impact Assessment process, which necessitates a comprehensive understanding of social, economic, and health impacts, especially for projects of this magnitude that may influence community character and

functioning. Without the complete dataset, the application fails to provide a thorough evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Consequently, without the full assessment, adherence to this policy cannot be established.

The implications for the procedural aspects are notable. The competent authority cannot effectively carry out a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This situation reflects a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and further supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposed development is inadequate and does not reflect the significant changes or the sensitivity of the West Lewis coastline. This area is known for its open Atlantic horizon and undeveloped character, which provide a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the area's character and resulting in a permanent transformation of the landscape.

The application does not effectively depict the extent of visual change. The size and closeness of the turbines would dominate views from residential locations, historic sites, and popular coastal areas. This would adversely affect visual amenity and diminish the naturalness and remoteness that define the region. The assessment fails to adequately communicate the level of impact or its importance within this sensitive landscape.

Methodological issues also arise 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 key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been underestimated, which undermines the assessment's reliability.

Moreover, there is a failure to consider the interconnected relationships between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as

separate entities rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further calls into question the proposal's compliance with policy requirements.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application does not provide sufficient detail to assess construction and pollution risks, which raises serious concerns. It involves significant seabed preparation and installation in a challenging Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures to be created after consent is granted. This approach limits the ability to evaluate their effectiveness or adequacy.

The West Lewis coastline is particularly sensitive, supporting clean coastal waters and vital habitats that may be harmed by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

There is also uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installation. Robust modelling and clearly defined management strategies are necessary to understand the potential extent, duration, and ecological effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures further heightens these issues. By postponing contingency planning until after consent, the application obstructs a proper evaluation of whether appropriate safeguards exist to deal with pollution incidents. This not only introduces procedural risk but also hinders the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and necessary mitigation must be evaluated before granting consent, and without this information, a lawful determination cannot occur. The application does not demonstrate compliance with policies related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking, as it does not fully address the impacts associated with what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore components is crucial, yet they have been assessed in isolation, leading to a disjointed understanding of the environmental and socio-economic repercussions.

The onshore aspects encompass cabling that traverses 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, which serves as a vital carbon reservoir and ecologically important habitat. The current application fails to deliver a thorough assessment of these impacts, which hinders the comprehension of the project's overall environmental implications.

By neglecting or postponing the evaluation of onshore effects, the application obstructs an accurate appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the division of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately examined.

There are substantial risks posed to sensitive environments, including machair systems and peatland areas that are safeguarded by policy. The application does not provide evidence that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through operational croft land presents possible conflicts with established land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, prompting doubts about its feasibility and lawful execution.

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

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that would create a persistent and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This significant change is not addressed within the Environmental Impact Assessment, which fails to evaluate the impact of such lighting on visual amenity, landscape character, and the experience of residents and visitors. The absence of this analysis is particularly concerning given the rising importance of dark skies for the area’s identity and the growth of astro-tourism.

Moreover, there is a lack of assessment regarding the potential effects of the lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risks of collision. The application notably does not include any evaluation of lighting impacts or a phototaxis study, which are essential for understanding how aviation lighting might influence these species and contribute to increased mortality rates.

This gap is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or the associated risks that come with artificial light. For instance, Kittiwakes may forage or migrate at night and are susceptible to disorientation from such lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant void in comprehending the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific

doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the overall ecological context.

In summary, the complete lack of assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analyses renders the application incomplete, making it incapable of supporting a lawful determination.

TOURISM

The application presents significant deficiencies in its assessment of tourism impacts, overlooking the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism, which is vital to the area, heavily relies on its wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Notably, the application states that 86% of visitors are attracted by the scenery. However, it fails to provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions to the area.

The tourism sector has seen remarkable growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this progress, the application does not examine how the anticipated industrialisation of the seascape and a potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the region. Without this critical analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences. The neglect of a Dark Skies Assessment exacerbates the already substantial gap in understanding the potential impacts on this increasingly recognised segment of the local economy, which includes nature-based and astro-tourism markets.

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

From a policy standpoint, the application does not demonstrate adherence to the

National Planning Framework 4, particularly concerning economic impacts and the necessity to illustrate net benefits. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks the requisite evidence for the competent authority to assess the economic consequences of the proposal.

Taken as a whole, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependencies leads to a significant evidential gap. This gap hinders a comprehensive assessment of the economic effects and reinforces the notion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. The proposal raises the same core issues that resulted in the refusal of the Lewis Wind Power application in 2008, where the level of industrialisation was deemed unacceptable. Presenting this application under a strengthened policy framework, which places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, does not address the fundamental shortcomings.

Critical gaps in baseline data hinder a complete and reliable evidential basis for assessment. The proposal continues to rely on an undefined design envelope and on unspecified mitigation measures, while omitting important impact pathways such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural failures within the application. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose a full Social Impact Assessment represents a material omission. These inadequacies prevent the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal contradicts the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. There is no evidence presented that health and wellbeing impacts are acceptable, nor is there any modelling of tourism impacts to support claims of net economic benefit. The assessment of cumulative impacts from offshore and onshore elements is insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially

significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

Moreover, the proposal is poised to cause 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 implications for tourism are all permanent effects that cannot be mitigated to an acceptable level.

In conclusion, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke relevant regulatory provisions to demand the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8DACEC0B

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. My concerns arise from a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, which reveal serious deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is set to take place off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The scale and design of this proposal raise urgent questions about its adherence to statutory requirements, national policy, and the principles that underpin sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, with a flexible design framework inhibiting a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures raises questions about their effectiveness, leaving the documentation inadequate for a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident as well. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4. This inconsistency is particularly prominent concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application fails to prove that it meets national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to assess the acceptability of the development within policy parameters.

The scale of this proposal is unprecedented for this area, with large turbines being positioned alarmingly close to the shoreline, thereby raising significant concerns about the landscape's capacity, visual impact, and overall environmental effects. When considered collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is incomplete. The methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound basis for evaluating impacts.

One significant omission involves otters, a European Protected Species. The application does not appropriately recognise or assess their use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are not properly assessed. This lack of assessment undermines any conclusions about the absence of significant effects on this species.

Additionally, there are deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This likely leads to an underestimation of their presence when compared to established land-based observations that show frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological limitations mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This generates uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the Environmental Impact Assessment regime or National Planning Framework 4 requirements, as protected species have not been properly identified or assessed. The uncertainty this introduces prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with the application is flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways have been identified in

the development site, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss for these birds.

A fundamental contradiction exists in the application, where the developer claims there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is typically necessary only if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the evidence presented. Furthermore, there is insufficient evidence regarding the potential impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the significance of these feeding grounds, and the use of modelling approaches introduces additional uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The introduction of large-scale turbines in such close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately reflect the scale of this change and the sensitivity of the receiving environment.

The magnitude of visual change resulting from the proposed turbines is inadequately represented in the application. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, which would directly affect visual amenity and degrade the defining qualities of naturalness and remoteness. The assessment does not convey the level of impact or its significance in relation to such a sensitive landscape.

Moreover, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important connections, altering the experience of heritage assets and disrupting their relationship to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been properly considered in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change presented is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The changes they would bring about are fundamental and permanent, rather than reducible to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately capture the scale of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with protecting this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

Uncertainty also surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty further extends to potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs any evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application lacks a thorough assessment of the ecological and socio-economic impacts. It fails to provide evidence that the diverse

habitats and activities in the area can be preserved without significant disruption.

One major concern is the assertion that fishing activities can be relocated without any consequences. The application does not demonstrate that there are alternative fishing grounds available, accessible, or capable of withstanding added pressure. This oversight is critical, as the potential for overfishing in other areas could have adverse economic effects on the local fishing fleet. Without a solid, evidence-based evaluation, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods will likely disturb marine life over vast areas, notably affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays the significance of these effects, lacking sufficient evidence to support this minimisation.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction questions the reliability of the assessment and highlights concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

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

framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

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

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

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

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

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

Additional Comments

I object to this proposal for seaborne multiple windfarms with associated inland disruption for interconnector work etc.

I am an inshore fisherman based in Carloway but fishing regularly the grounds from Mangersta northwards to the Butt of Lewis and beyond. and I am extremely concerned at the damage / disruption these proposals will have on the local ecology , and in particular the impact, both construction and long term use of windfarms, will have on our local fishing grounds.

Visually they will be unsightly monstrosities, but it is what you do not see that concerns me most, what is happening underwater to our traditional fishing grounds.

I object to these proposals.Pg

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: 3A838F38

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

Dear Sir/Madam

This objection serves as a formal challenge to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and robust cultural identity. There are fundamental concerns regarding the proposal's alignment with statutory obligations, national policy, and the principles underpinning sustainable development, particularly due to its unprecedented scale, proximity to the shore, and design.

The application is deficient in providing a sound evidential basis necessary for a lawful determination. It lacks critical environmental data, offers limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The flexible design framework employed does not facilitate a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential impacts on the environment, culture, or community, and claims of negligible or non-significant effects lack robust support.

There are substantive conflicts with established policy frameworks. 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 habitats, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies are critical as they directly relate to the statutory tests required for consent and hinder the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, particularly the positioning of large turbines in close proximity to the coastline, raises significant concerns about landscape capacity, visual impact, and overall environmental effects. Taken together, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy indicate that the application is incomplete and cannot support a lawful determination. Therefore, it is imperative that the precautionary principle is invoked in this context.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is reliant on an undefined design envelope, which raises significant concerns regarding its environmental assessment. Without commitment to specific turbine dimensions, layouts, or configurations, the proposal introduces considerable uncertainty. This lack of specificity compromises the integrity of the Environmental Impact Assessment Report, as it does not enable a consistent application of a worst-case scenario, hindering both the public and the competent authority's understanding of the environmental impacts that may arise from the development.

Furthermore, there is a troubling deferral of essential information regarding mitigation measures, monitoring strategies, and management plans, which have not yet been defined. Seeking consent on the premise that environmental harm will be addressed at a later stage precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a practice is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before determination.

Evidential deficiencies are also present within the report, characterised by gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a concerning deficiency in the assessment of marine ecology and protected species, failing to provide a complete understanding of the ecological receptors within the sensitive West Lewis coastal environment. This biologically active marine system has been inadequately studied, with incomplete baseline data and

methodologies that do not effectively capture species presence, behaviour, or habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, which are recognised as a European Protected Species. The application does not adequately assess their active use of coastal areas for foraging and movement. The omission of critical information regarding their core foraging range and behavioural patterns means that the possible effects of construction disturbances, noise, and increased activity remain unexamined. This shortfall undermines any conclusions about the absence of significant effects on otters.

The assessment of basking sharks also reveals critical flaws, particularly due to the reliance on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that show frequent use of these waters. By failing to incorporate or properly consider relevant data, the assessment presents an incomplete baseline, thereby weakening the reliability of the conclusions.

The methodological shortcomings lead to conclusions of negligible or non-significant effects being drawn from assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data hinders the ability to meaningfully assess cumulative and indirect impacts, as well as seasonal variations and wider ecosystem interactions. This lack of clarity raises uncertainty regarding the actual scale of risk to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which activates the precautionary principle. In light of these factors, granting consent would not be lawful.

In summary, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies hinder 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 ornithological assessment presented is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. It has been identified that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory

routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A major inconsistency arises within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment does not sufficiently confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not adequately considered, and the dependence on modelling approaches introduces a level of uncertainty, particularly concerning species facing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain insufficiently understood.

The location of turbines within a recognised migratory corridor adds another significant risk, effectively posing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential criteria 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, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which obstructs a lawful conclusion in favour of consent. Furthermore, the identified deficiencies 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 places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fundamentally fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where language, community, tradition, and environment are deeply intertwined. Instead of recognising heritage as a living, evolving aspect of community life, the assessment reduces it to mere isolated and static assets, neglecting their ongoing social, cultural, and spiritual significance.

A significant oversight in the assessment is the treatment of culturally significant sites

such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active sites of burial and spiritual practice, yet they are inaccurately characterised as static features. This mischaracterisation ignores their continued use and the profound impact that development may have on their surrounding environment, resulting in an incomplete evaluation of their cultural significance to the community.

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language and the traditions that have long connected the community to the coastal environment. These elements are integral to the area's identity and their absence from the assessment is a significant flaw. Without acknowledging these vital factors, the true cultural impact of the proposed development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent initiated. This lack of meaningful engagement significantly undermines the legitimacy of the assessment, disregarding essential principles of participation in decisions that affect cultural and environmental interests.

The procedural shortcomings are compounded by the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot adequately fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination regarding the application unlawful.

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

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the proposed development remain unassessed, and the application does not provide a sufficient foundation for understanding the true cultural cost of this proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is insufficient and does not capture the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not adequately convey the extent of this visual change. Given the scale and closeness of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the level of impact or its importance in relation to such a sensitive landscape.

Concerns arise regarding the choice and presentation of visual viewpoints. There is evidence 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 visual impact has been understated, which affects the assessment's reliability.

Additionally, there is a failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape interlinked visually and spatially with the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete analysis 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 understood and their connection to the natural horizon. This constitutes not just a visual impact but also a broader cultural and spatial damage that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which emphasises the need to protect natural areas and historic assets. The degree of change proposed does not align with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy conformity.

It is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resultant change is not something that can be reduced 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 dependable evaluation and reinforce the view that the proposal conflicts with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely

environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application relies on undefined future mitigation and contingency measures to be prepared after consent. This approach raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination.

While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these incidents will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the competent authority's ability to assess whether sufficient safeguards are in place to respond to pollution events. This introduces procedural risk and raises significant concerns regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent, and the lack of such information means that a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

A critical concern lies in the assumption that fishing activities can be relocated without negative consequences. The application does not provide any evidence that alternative

fishing grounds exist, are accessible, or can accommodate the additional pressures that may arise. This oversight is particularly important, as displacing fishing efforts could lead to overfishing in other areas, which may result in broader economic ramifications for the local fishing fleet. In the absence of a well-supported and clear assessment, the potential impacts on both fisheries and local livelihoods remain poorly understood.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is critically deficient as it neglects to evaluate the implications for dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is notable for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The proposed project would introduce permanent red aviation lighting, which would be visible over long distances and would create a continuous and intrusive “wall of light”

effect across the western horizon, fundamentally transforming the night-time landscape.

The application fails to consider how this lighting would affect visual amenity, landscape character, and the experiences of both residents and visitors. This failure is particularly relevant given the significance of dark skies for the region's identity and for emerging sectors such as astro-tourism. As a result, the overall landscape and environmental assessment lacks critical components.

Furthermore, there is an alarming absence of analysis concerning the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit heightened sensitivity to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, thereby omitting an evaluation of how aviation lighting could affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are similarly at risk of disorientation due to artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data presents a significant shortfall in the understanding of ecological impacts.

In the absence of an evaluation of nocturnal impacts, it is 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, invoking the precautionary principle and precluding a lawful determination.

From a policy standpoint, the omission stands in conflict with National Planning Framework 4, which pertains to the safeguarding of natural environments and the quality of the environment itself. Moreover, it undermines a comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of ecological integrity.

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife presents a considerable evidential void. The absence of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and fails 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 as outlined by statutory duties, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation

were identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

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

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with negative impacts on tourism, would result in permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

The west coast of Lewis is one of the most extraordinary concentrations of marine life in the British Isles — whales, dolphins, divers, gannets, basking sharks, otters. The Scottish Government's own scientists called it probably the richest marine mammal habitat in the UK.

We shouldn't industrialise a habitat of this importance and significance - it would not be without harmful ecological consequences, however well-intentioned the energy it generates.

The unprecedented scale and proximity to shore is the wrong project in the wrong place. The nature and habitat should be valued, protected and left undisturbed.

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: B0EE9135

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an analysis of the Environmental Impact Assessment Report and its accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, 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, near-pristine environment, and strong cultural identity. The scale, proximity, and design of this proposal raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis to support a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and several key aspects of the proposal remain undefined. The employment of a flexible design framework obscures the potential significant effects, while the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

There exist clear and substantive conflicts with policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly affect the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impacts. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential shortcomings, and evident non-compliance with policy illustrate that the application is incomplete and incapable of underpinning a lawful determination. In this context, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to fully account for the potential environmental effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a substantial level of uncertainty. This uncertainty hampers the ability to apply a worst-case scenario consistently, ultimately undermining the integrity of the assessment. Consequently, the information provided may not accurately represent the impacts of the eventual construction, leaving both the public and competent authority without a clear understanding of the actual environmental consequences.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means that environmental harm is expected to be addressed later, making it impossible to meaningfully evaluate the effectiveness of these measures or to assess residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment process, which necessitates that significant effects and mitigation strategies are clearly defined before any determination can occur.

There are also considerable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies create uncertainty regarding the magnitude and significance of impacts, especially in cases where claims of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that are incompatible with statutory obligations.

Ultimately, the application does not satisfy the evidential standards set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment with the National Planning Framework 4, particularly in relation to the protection of biodiversity and environmental integrity, as it has not been shown that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority without the necessary information to make an informed decision regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, failing to meet the requirements set by the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of realistic alternatives based on their environmental impacts, it provides a narrative of the project's development. This method does not show that less harmful options have been adequately considered, evaluated, and chosen over more damaging ones.

There is no clear or evidence-based evaluation of different offshore locations, development scales, or design configurations. Notably, the developer has not shown that they have seriously contemplated placing turbines further offshore, where impacts on visual, ecological, and coastal aspects would likely be lessened. Given the sensitivity of the West Lewis coastline, the significance of proximity to the shore in assessing impacts means that the lack of such analysis makes it impossible to conclude that the proposed siting is the least damaging option available.

The shortcomings also relate to cable routing and landfall assessment. There is insufficient evidence to suggest that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis show that mitigation by design has not been employed, with an over-reliance on measures taken after design completion.

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

This lack of assessment undermines adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The failure to provide a structured and comparative assessment is a significant oversight that contributes to the 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 in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European

Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development reveals significant flaws, undermining its credibility. There are substantial gaps in the evidence and internal inconsistencies that raise serious questions about its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already declining. However, the application does not provide the necessary evidence to demonstrate that these species will not be adversely affected. The development site is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also putting forth a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and

suggests that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not adequately recognised, and the reliance on modelling methods introduces further uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully considered.

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

Regulatory concerns emerge as the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally deficient, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. The application adopts an overly simplistic approach, viewing heritage merely as a collection of static assets instead of appreciating their ongoing social, cultural, and spiritual significance to the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment labels them as static features, neglecting their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete

evaluation of cultural impacts and overlooks their importance in community life.

Additionally, the application neglects to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are pivotal to the area's identity yet are conspicuously absent from the assessment, representing a significant oversight. The lack of consideration for these factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of an Indigenous People; however, there has been no implementation of a process for Free, Prior and Informed Consent. The absence of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission, in itself, prevents a lawful determination.

From a policy standpoint, these shortcomings position 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, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural implications of the development remain inadequately assessed, rendering the application insufficient for a proper evaluation of its true cultural cost.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap. This lack of transparency means that both the public and the competent authority cannot grasp the complete scope of social risks identified through the developer's own research. Available summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore based on actual experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is hindered, limiting the ability to evaluate their importance in the decision-making process.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with

the developer's own findings highlighting concerns about "cultural loss." Despite this, such impacts have not been fully considered in the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be at stake. By failing to provide the complete dataset, the application lacks a solid evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and prevent harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot prove compliance with this policy.

The procedural implications are serious. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, seascape, and landscape impacts is critically inadequate and fails to reflect both the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous industrial presence, fundamentally altering this character and resulting in a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately portray the extent of the visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately communicate the significance of this impact in relation to such a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the

most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests that the magnitude of visual impact could be understated, which calls into question the reliability of the assessment.

Moreover, the assessment overlooks 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 context linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment 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 sever these critical connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This situation represents not just a visual impact but a wider cultural and spatial detriment that the application has not sufficiently assessed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in its commitment to protecting natural spaces and historic assets. The scale of change is incompatible with the necessity to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a comprehensive assessment of construction and pollution risks, which is critical for understanding the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic environment, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent is granted, hindering a meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises serious concerns, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as

sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide sufficient information on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, the potential extent, duration, and ecological impacts of these plumes cannot be determined. This uncertainty also extends to the effects on marine species and habitats, which have already been identified as sensitive in the wider assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before consent can be granted. The absence of this critical information means that a lawful determination cannot be reached. 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 create a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment pertaining to fisheries and marine life is inadequate, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a varied marine ecosystem and a functioning fishing industry. However, the application does not convincingly demonstrate how these habitats and activities can be preserved or sustained without considerable disruption.

A key concern is the presumption that fishing operations can be relocated without adverse effects. The application lacks evidence to suggest that there are alternative fishing areas that are both available and suitable for accommodating additional fishing activity. This is a crucial oversight, as the displacement of fishing efforts could lead to overfishing in other regions and may have broader economic ramifications for the local fishing fleet. Without a robust, evidence-based assessment, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling for prolonged periods is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the necessity for licences to permit harm to European Protected Species, while simultaneously characterising the impacts as negligible. This contradiction diminishes the reliability of the assessment and raises questions about adherence to the Habitats Regulations, particularly in instances where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves offshore turbines alongside significant onshore infrastructure, including cabling and a substation near Stornoway. However, the assessment of these onshore components is materially incomplete, failing to acknowledge the interconnected nature of the project. This fragmented approach obscures the overall scale of the environmental and socio-economic impacts that arise from the project.

Among the onshore elements is the cabling which crosses protected moorland, alongside access infrastructure that traverses sensitive landscapes. Excavation activities will take place in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

The failure to evaluate onshore impacts prevents a proper assessment of cumulative effects, which is essential according to the Environmental Impact Assessment process. By treating the offshore and onshore components separately, the application fails to fully account for their combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks from the proposed project. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises concerns about carbon balance, as the disturbance of peatland could lead to the release of stored carbon, creating a carbon debt that contradicts the objectives of renewable energy development. This critical issue is not addressed adequately in the application, leaving uncertainty about whether the overall carbon balance remains beneficial.

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

From a policy perspective, the lack of a holistic assessment of the project, alongside failure to protect peatlands, habitats, and land use interests, conflicts 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 the 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 preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would create an intrusive “wall of light” effect visible over long distances, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies for the area’s identity and for emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. It indicates a clear gap in the

overall landscape and environmental assessment.

Additionally, there is no consideration of the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means the application does not consider how aviation lighting may affect these species or contribute to higher mortality rates.

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

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

From a policy perspective, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also undermine the broader evaluation of landscape and seascape impacts, as night-time character is an integral part of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application recalls the issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. Despite the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not adequately address these concerns.

There are significant gaps in the evidence provided, with a reliance on an undefined design envelope and unspecified mitigation measures. Key impact pathways, particularly concerning nocturnal wildlife, the entirety of the onshore infrastructure, and tourism effects, have been omitted. This incomplete Environmental Impact Assessment fails to provide a comprehensive understanding of likely significant effects or any residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of a full Social Impact Assessment is a critical oversight. Such omissions 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 National Planning Framework 4 by not demonstrating protection for biodiversity and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, clouding understanding of effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties around environmental risks are potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

This 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 impacts on tourism will result in permanent effects that cannot be mitigated satisfactorily.

Overall, the application is unfit for determination both procedurally and substantively. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority must refuse consent for this application or utilise relevant regulatory provisions to require the submission of the necessary missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm be 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: C12C7331

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. 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 rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and 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 safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents a number of significant deficiencies that compromise its reliability and transparency regarding the potential environmental effects of the proposed development. One of the most critical issues is the use of a flexible Project Design Envelope, which lacks specificity concerning turbine dimensions, layouts, or configurations. This approach introduces a level of uncertainty that undermines the assessment's integrity, as it prevents a consistent application of worst-case scenarios. Consequently, the impacts outlined may not accurately represent those of the final development, obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that have yet to be established. This reliance implies that environmental harm will be addressed after consent is granted, hindering any meaningful evaluation of the effectiveness of these measures and preventing a thorough assessment of residual impacts. This deferral of essential information to a post-consent phase is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly identified prior to determination.

Additionally, there are major evidential gaps, including inadequate baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These shortcomings create uncertainty about the scale and significance of the impacts, especially when negligible or non-significant effects are asserted without solid supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts, thereby generating scientific uncertainty that fails to meet statutory obligations.

As a result, the application does not satisfy the evidential criteria outlined in the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not align with National Planning Framework 4 stipulations regarding biodiversity protection and environmental integrity, as it has not been demonstrated that the impacts have been comprehensively assessed or that suitable safeguards are in place.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a profound inadequacy in meeting the criteria for sustainable development as outlined by statutory obligations,

national policy, and evidential benchmarks. This application reiterates 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 presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to adequately address these concerns.

There are significant deficiencies in the evidential basis provided for this determination. Notable gaps exist in the baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures raises concerns. Furthermore, there is a concerning omission of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of potential significant effects or residual impacts.

Additionally, there are evident 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 fully disclose the Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In direct contradiction to National Planning Framework 4, the proposal fails to demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

Moreover, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism are permanent consequences that cannot be effectively mitigated.

In summary, the application is procedurally and substantively unsuitable for determination. The myriad information deficiencies, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the necessary

information.

A formal request is hereby made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 39B845C7

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural heritage. Concerns arise from the scale, design, and proximity of the proposal, questioning its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful assessment. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, many key elements of the proposal remain undefined. This flexible design framework hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are evident and serious policy conflicts inherent in this proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and the well-being of communities. The application does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests needed for consent and undermine the competent authority's capacity to conclude that the development meets policy standards.

Moreover, the unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies in the ornithological assessment, raising substantial concerns about its reliability. The conclusions drawn are undermined by internal inconsistencies and gaps in evidence. Notably, the west coast of the Isle of Lewis is home to internationally important seabird populations that are

already experiencing declines, yet the application fails to satisfactorily demonstrate that these species will not be adversely impacted. The proposed development is sited within critical foraging areas and migratory pathways, yet the assessment inadequately considers the potential consequences of displacement, collision risk, or habitat loss.

A significant contradiction is evident, as the developer asserts that no significant adverse effects will occur, while also advancing a Habitats Regulations derogation case, which is only warranted in situations where significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that its conclusions are not substantiated by adequate evidence. Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly evaluated, and the reliance on modelling techniques introduces a level of uncertainty, particularly for declining species such as Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the evidential threshold necessary to assert no adverse effect on the integrity of protected sites is not met. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion that would support consent.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

to a permanent and irreversible transformation of the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans accompanying the application. Instead, it depends on the preparation of mitigation and contingency measures post-consent, which hinders a thorough assessment of their sufficiency and effectiveness.

This reliance on unspecified future measures is particularly alarming given the sensitivity of the receiving environment. The coastline of West Lewis is characterised by clean coastal waters and essential habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks associated with sediment mobilisation and potential chemical or oil spills, it fails to provide adequate information on the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Prior to granting consent, it is imperative that likely significant effects and their mitigation are thoroughly assessed, and the absence of such information precludes a lawful determination. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts results in a materially deficient assessment. These deficiencies obstruct a rigorous evaluation of construction and pollution risks and further corroborate 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 is fundamentally flawed in its ability to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. It is presented now under a

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

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

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

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

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

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

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

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

Additional Comments

To Whom It May Concern,

I wish to formally object to the proposed wind farm development off the Isle of Lewis.

This proposal risks causing significant and irreversible harm to one of the most unique and environmentally sensitive landscapes in the British Isles. The Isle of Lewis is internationally recognised for its wild Atlantic coastline, peatlands, open skies, biodiversity, tranquillity, and cultural heritage. Industrial-scale development of this nature is fundamentally incompatible with the character of the area.

The proposed scale of the development is deeply concerning. Turbines of this size and number would industrialise an area valued precisely because it remains largely unspoilt. The visual impact on coastal landscapes, peatland vistas, historic sites, wildlife habitats, and the wider sense of remoteness would be profound and long lasting. Historic Environment Scotland has previously raised concerns regarding the adverse impact of wind farm developments on the setting of monuments and designed landscapes in Lewis.

There are also serious environmental concerns regarding the disturbance of peatland ecosystems. Lewis contains internationally important blanket bog habitat, which acts as a significant carbon store and supports rare birdlife and delicate hydrological systems. Research examining previous Lewis wind farm proposals warned that road building, turbine foundations, drainage disruption, and excavation on deep peat can lead to erosion, habitat degradation, hydrological instability, and long-term ecological damage.

The potential impact on wildlife and marine ecosystems must also be fully considered. Previous objections to large-scale wind developments in Lewis referenced concerns regarding protected bird species and sensitive habitats. The waters and coastlines around Lewis form part of a rich and interconnected Atlantic ecosystem which should not be treated as an industrial corridor.

In addition, the cumulative impact of years of construction activity, heavy infrastructure works, lighting, access routes, and associated grid development would fundamentally alter the peaceful nature of the island. Lewis is not simply a location on a map. It is a living landscape, culturally and environmentally significant to residents, visitors, crofters, wildlife, and future generations alike.

I support renewable energy when it is appropriately scaled and sensitively located. However, developments of this magnitude should not come at the expense of internationally valued landscapes and ecologically important environments. Scotland's transition to renewable energy must not involve sacrificing its remaining areas of natural beauty and environmental significance.

The Isle of Lewis is a place of extraordinary character, biodiversity, heritage, and tranquillity. Once industrialised on this scale, that loss cannot easily be undone.

I respectfully urge the decision-makers to reject this proposal.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A5B40054

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a detailed review of the Environmental Impact Assessment Report alongside other supporting documents, highlighting several material deficiencies related to planning, environmental factors, cultural concerns, and procedural aspects. Situated off the west side of the Isle of Lewis, the proposed development area is characterized by its Atlantic-facing coastline, a near-pristine environment, and a significant cultural identity. The size, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks sufficient evidence for a lawful determination. There are substantial gaps in critical environmental data, with baseline information that is both limited and inconsistent, and many elements of the proposal remain undefined. The flexible design framework employed obscures an understanding of likely significant effects, and the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the supporting documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not backed by robust evidence.

There are evident policy conflicts within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural areas, cultural heritage, and public health and wellbeing. The application fails to establish that it can meet national standards for protecting biodiversity, climate interests, and environmental integrity. These discrepancies are crucial as they pertain to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed wind farm is unprecedented for this location, with large turbines set very close to the shoreline, which raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these issues, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents several significant deficiencies that compromise its reliability. This coastal environment along West Lewis is noted for its high biological activity and sensitivity, yet the baseline data remains incomplete. The methodologies employed fail to adequately capture vital information regarding species presence, behaviour, and habitat use. Consequently, this inadequacy undermines the evidential foundation necessary for evaluating potential impacts.

A particularly notable gap in the assessment pertains to otters, a species protected under European law. The application overlooks their active use of coastal zones for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. This oversight leads to an inadequate evaluation of the possible effects arising from construction disturbances, noise, and increased activity, ultimately questioning the conclusion that significant effects on this species are absent.

Additionally, the examination of basking sharks reveals further shortcomings. The reliance on aerial surveys introduces notable detection bias, especially in Atlantic weather conditions, which likely underestimates their presence. This contrasts sharply with established land-based observations that indicate frequent usage of these waters by basking sharks. The failure to integrate or properly address such relevant data contributes to an incomplete understanding of the ecological baseline, thereby compromising the strength of the conclusions drawn.

These methodological shortcomings imply that assertions of negligible or non-significant effects stem from assumptions rather than solid evidence. Moreover, the lack of robust baseline data hinders a meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainties introduced through this analysis prevent the possibility of dismissing adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions leads to an assessment that cannot be regarded as reliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the notion that the application lacks a solid evidential basis.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. This initiative would result in a significant

industrial presence that fundamentally alters the existing character of the landscape, leading to a permanent and irreversible transformation. The application fails to accurately represent the magnitude of the visual change, as the scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Consequently, this would adversely affect visual amenity, undermining the qualities of naturalness and remoteness that currently define the area.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, compromising the reliability of its findings. Furthermore, the interconnected relationship between landscape, seascape, and cultural heritage has not been properly assessed. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are linked to the wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This change represents not only a visual impact but also a broader cultural and spatial harm that has not been adequately considered in the application. From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which seeks to protect natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a robust worst-case assessment further undermines any claims of compliance with policy requirements.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are therefore fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation strategies. Collectively, these deficiencies in the assessment prevent a reliable evaluation of the proposal's impacts, reinforcing the conclusion that it is incompatible with the protection of the landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment fails to provide a strong evaluation of the ecological or socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not prove that these uses and habitats can be protected or maintained without serious disruption.

A significant concern is the assumption that fishing activities can be moved without any consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or able to handle additional pressure. This lack of information is crucial, as displacement could lead to overfishing in other areas and might have broader economic implications for the local fishing fleet. Without a clear, evidence-

based assessment, it is impossible to understand the impacts on fisheries and local livelihoods.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise produced during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over large areas, affecting species such as dolphins. The predicted disturbance to a significant part of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Moreover, there is an inconsistency in the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises issues concerning compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal approval.

The assessment does not account for cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough examination 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 show compliance with National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes 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 the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

A reliable evidential basis for determination is not provided in the application. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. Consequently, the

Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

There are procedural failures present in the application. The lack of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts the principles of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to ensure that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit as a result of missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which activates the precautionary principle, thus preventing any lawful determination that impacts are acceptable.

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 impacts on tourism are all permanent effects that cannot be mitigated to an acceptable level.

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

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: 08B56BAF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is informed by a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, which reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the proposal in relation to compliance with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to offer a full, transparent, or reliable overview of the likely environmental effects associated with the proposal. The flexible Project Design Envelope introduces uncertainty, as it does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty undermines the assessment's integrity, resulting in potential discrepancies between the impacts presented and the actual development constructed. Consequently, both the public and the competent authority are left without a clear understanding of the environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the assumption that environmental harm will be managed later hinders any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

The report also exhibits serious evidential shortcomings, with gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. A lack of sufficient information complicates a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with the National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination on the application.

MARINE ECOLOGY AND PROTECTED SPECIES

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

behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential basis to evaluate potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its findings. The application is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected.

There exists a critical contradiction within the application; the developer asserts that no significant adverse effects are anticipated while simultaneously advancing a case for Habitats Regulations derogation, a process triggered only when significant harm is expected. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the unclear understanding of behavioural responses.

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

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

The deficiencies identified in the assessment also indicate a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, these various shortcomings render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Collectively, they hinder a robust evaluation of the impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach that treats heritage as a collection of isolated, static assets,

ignoring their ongoing social, cultural, and spiritual roles within the community.

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

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the area's identity but are entirely absent from the evaluation, representing a considerable omission. Without acknowledging these factors, the cultural impact of the development cannot be fully grasped.

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

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

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

Overall, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer's own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

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

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

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 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 waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application lacks a comprehensive assessment of the ecological and socio-economic impacts associated with the proposed development. It fails to adequately protect or maintain these essential habitats and uses, which raises significant concerns about potential disruption.

A critical issue lies in the assumption that fishing activities can be displaced without

consequences. The application does not provide any evidence that alternative fishing grounds exist or that they would be accessible and able to sustain additional pressure. This gap is troubling as it presents a risk of overfishing in other areas, potentially causing broader economic repercussions for the local fleet. The absence of a thorough and evidence-based evaluation means that the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses considerable risks to marine species due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is expected to disturb marine life across extensive areas, particularly affecting local species such as dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application tends to minimise these significant effects without adequate evidence.

There is also a notable inconsistency within the application regarding the acknowledgement of the need for licences to permit harm to European Protected Species, while simultaneously describing such impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that requires legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from multiple pressures, such as habitat disturbance, noise, 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 does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable repercussions on marine biodiversity, ultimately questioning whether the proposal can be deemed sustainable development.

In summary, the deficiencies surrounding the evidence on fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the assessment result in an incomplete and unreliable evaluation. These shortcomings hinder a proper understanding of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It presents the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, despite being framed within a more robust policy environment that prioritises biodiversity, peatland

protection, landscape integrity, and community wellbeing, does not rectify those issues.

Critical deficiencies are evident in the evidential basis provided for the application. It lacks comprehensive baseline data, continues to employ an undefined design envelope, and relies on unspecified mitigation measures. Key impact pathways have been overlooked, including effects on nocturnal wildlife, the complete onshore infrastructure, and potential tourism impacts. As a result, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of likely significant effects and residual impacts.

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

The proposal contradicts National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, masking potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals reveal internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, combined with conflicts in policy and unresolved environmental risks, precludes 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

I formally object to the above application as it contravenes the following planning policies and guidance:

Significant Adverse Impacts on Protected Birdlife and Habitats: The development occupies primary foraging grounds for the Lewis Peatlands SPA red-throated divers, falls within the foraging range of the St Kilda gannet colony, and crosses a principal UK migratory corridor for protected species, including whooper swan and pink-footed goose. The EIAR fails to adequately assess the threats of collision, displacement, and barrier effects to these declining populations. Thus, consent would breach the Conservation (Natural Habitats &c.) Regulations 1994, the 2018 Offshore Regulations, the Marine (Scotland) Act 2010, and the Wildlife and Countryside Act 1981, as the proposal is likely to adversely affect the integrity of the following SPA's: Lewis Peatlands, West Coast of the Outer Hebrides, Seas off St Kilda and St Kilda. NPF4 Policy 7 l 'Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved.' NPF4 Policy 11 e ix Impact on 'biodiversity including impacts on birds' must be addressed.

Lack of understanding of Cultural Significance: The EIAR makes no reference to the personal, cultural or historical attachment of the population of Lewis to their landscape and heritage, and fails to assess impacts on the living intangible heritage of the Gaelic community. Until a full assessment addressing impacts on Gaelic language and culture, community wellbeing, and west Lewis communities' relationship with their coastline is completed and publicly consulted upon, this application cannot lawfully be determined.

NMP Para. 4.20 'The historic environment includes all aspects of the environment resulting from the interaction between people and places through time,'.

NPF4 Policy 7 a 'Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place.'

Unassessed Onshore Impacts and Breach of Statutory Rights of Crofters: Granting offshore consent while onshore impacts on irreplaceable machair and deep peatland remain unassessed, directly contravenes NPF4 Policy 3, which requires biodiversity (including irreplaceable habitats) to be left in a demonstrably better state. In addition the proposal fails to engage the statutory rights of crofters under the Crofters (Scotland) Act 1993.

NMP Para. 4.77 'There should be a presumption in favour of publicising applications for marine and terrestrial components of a development together during consenting processes.'

Unassessed impact on the health and wellbeing of island residents. Due to the proximity of the turbines to populated areas, a full assessment of any potential dangers to public health should be conducted and the results shared and taken into consideration as part of the application process.

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: 71E674C3

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. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious doubts regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, baseline information is both limited and inconsistent, and numerous aspects of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of likely significant effects, while the unspecified mitigation measures make it impossible to assess their potential effectiveness. Consequently, the provided documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Moreover, there are evident and serious policy conflicts. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts directly impact the statutory tests necessary for consent and compromise the competent authority's ability to affirm that the development is acceptable in policy terms.

The scale of this proposal is unprecedented in this specific location, with large turbines positioned in close proximity to the shoreline, leading to substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance illustrate that the application is incomplete and incapable of securing a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a range of significant evidential deficiencies that critically undermine the assessment process. There are notable gaps in baseline data, limitations in the methodology employed, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts. This is particularly concerning where the application presents conclusions of negligible or non-significant effects without robust supporting data. The lack of comprehensive information obstructs a clear understanding of both cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Furthermore, the Environmental Impact Assessment Report is materially deficient, lacking a complete, transparent, or reliable account of the likely environmental effects of the proposal. The employment of a flexible Project Design Envelope, without firm commitments to specific turbine dimensions, layouts, or configurations, adds a layer of significant uncertainty. This approach prevents the consistent application of a worst-case scenario, undermining the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

The reliance on unformulated mitigation measures, monitoring strategies, and management plans represents another critical issue. As consent is sought based on the premise that any environmental harm will be mitigated at a later stage, this deferral inhibits any meaningful evaluation of effectiveness or assessment of residual impacts. Such postponement of key information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

As a result of these substantial deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This circumstance invokes the precautionary principle, particularly with regard to protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, as it does not adequately 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 both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects and leave the competent authority unable to make a well-informed determination based on the information presented.

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 proposal lacks transparency regarding social impacts, health, and wellbeing, significantly undermining its evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This absence creates an evidential gap that hinders both public understanding and the competent authority's ability to grasp the extent of social risks identified in the developer's research.

Residents have reported experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement with the community and are not based on speculation. However, the failure to release the complete assessment restricts proper scrutiny of its findings and limits the determination of their significance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these social impacts have not been fully integrated into the application or given due consideration. The withholding of the full Social Impact Assessment conceals the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functioning could be affected. Without the complete dataset, the application fails to provide a robust evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant; the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw in the application and a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, coupled with documented existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is lacking and does not adequately convey the extent of change or the sensitivity of the local environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped landscape, possesses a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to fully capture the scale of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and representation of visual viewpoints in the assessment. There are indications that the viewpoints selected may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly in relation to important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been downplayed, which compromises the reliability of the assessment.

Moreover, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and their relation to the natural horizon. This change signifies not just a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the proposal.

From a policy perspective, this proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of change proposed is inconsistent with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is not merely something that can be reduced to an acceptable level through mitigation efforts; it is fundamental and permanent.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the necessary protections for this landscape.

SUMMARY

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

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

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 807B02DF

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. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. 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 have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision-making process. Essential environmental data is absent, the baseline information provided is both limited and inconsistent, and crucial elements of the proposal remain unclear. The flexible design framework used within the application inhibits a comprehensive assessment of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to facilitate a thorough understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There exist substantive conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. 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 incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient detail and fails to offer a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with 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 commitment undermines the assessment's integrity and leads to potential discrepancies between the impacts reported and the actual development constructed. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

Furthermore, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later obstructs any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to decision-making.

Additionally, the application is marred by notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This situation leads to uncertainty concerning the scale and significance of impacts, particularly where negligible or non-significant effects are posited without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it is unable to prove that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data together render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, thus leaving the competent authority without adequate information to make a well-informed determination of the application.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the complete Social Impact Assessment raises serious concerns regarding the social impacts, health, and wellbeing of the community. Although the

developer engaged local residents through focus groups, the absence of the full report creates a critical evidential gap that hinders public understanding and the competent authority's evaluation of the identified social risks. This lack of transparency not only undermines public trust but also obstructs proper scrutiny of the findings, which are vital for determining their significance in the decision-making process.

Available summaries show that residents are already experiencing significant stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts, rooted in direct community engagement, are concrete and not speculative. Additionally, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these critical impacts have not been adequately integrated into the main application or considered with the seriousness they deserve. Consequently, withholding the full assessment obscures the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. For developments of such magnitude, it is essential to fully understand the social, economic, and health implications, especially when community character and functioning are at risk. The omission of the complete dataset within the application denies a comprehensive evidential basis for balancing potential benefits against the associated harms.

From a policy standpoint, the application fails to comply with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence suggests existing adverse effects that remain undisclosed. Without access to the full assessment, it is impossible to demonstrate compliance with this crucial policy.

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

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This undermines the potential for a lawful determination and firmly indicates that the application lacks sufficient supporting information.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development in light of statutory obligations, national policy, and evidential requirements. This proposal mirrors the central issues that resulted in the rejection of the Lewis Wind Power project in 2008, where the level of industrialisation was deemed unacceptable. The current proposal is

presented under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There are deficiencies in baseline data, an undefined design envelope, unspecified mitigation measures, and the exclusion of important impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment remains incomplete and does not provide a comprehensive understanding of potential significant effects or residual impacts.

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

The proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and cannot show a net economic benefit due to a lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

There are also significant uncertainties regarding environmental risks. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard necessary to confidently exclude adverse effects has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would cause considerable and irreversible alterations to a delicate landscape. The industrialisation of the coastline facing the Atlantic, the loss of dark skies, disruption to cultural and visual connections, and effects on tourism represent permanent changes that cannot be mitigated to an acceptable degree.

In summary, the application is both procedurally and substantively inadequate for determination. The numerous information deficiencies, along with policy conflicts and unresolved environmental risks, prevent a lawful and evidence-based decision. The competent authority must therefore refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the necessary missing information.

A formal request is made 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: 80DABE46

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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the proposed development is significantly lacking in transparency and is inadequate for a lawful evaluation. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been

published. This omission creates a substantial evidential gap that hinders both public understanding and the ability of the competent authority to grasp the full range of social risks uncovered by the developer's own research.

Summaries made available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and therefore are not mere speculation. However, the lack of disclosure regarding the full assessment limits proper scrutiny of the findings, ultimately restricting the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" identified in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor afforded the necessary consideration. The failure to release the complete Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for developments of this magnitude, particularly when they may disrupt community character and functioning. The application, in withholding the full dataset, fails to provide a comprehensive evidential foundation for balancing the proposed benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should contribute to positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain inadequately disclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application that fails to meet the evidential standards required by the Environmental Impact Assessment regime.

Overall, the decision to withhold the full Social Impact Assessment, coupled with evidence of current negative impacts, results in an incomplete and unreliable evaluation. This lack of information precludes a lawful determination and underscores the conclusion that the application is not backed by sufficient data.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is procedurally and substantively unfit for determination, necessitating its refusal in its entirety. There are considerable gaps in the evidential basis necessary for a reliable assessment. The

reliance on an undefined design envelope, unspecified mitigation measures, and a lack of comprehensive baseline data contribute to this deficiency. Key impact pathways, particularly those concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. As a result, the Environmental Impact Assessment fails to provide a complete understanding of the likely significant effects and residual impacts.

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

The absence of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience.

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

The proposal would instigate substantial and irreversible change to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, and disruption of cultural and visual relationships will have permanent effects that cannot be mitigated to an acceptable level. Collectively, the significant information deficiencies, policy conflicts, and unresolved environmental risks render the application unfit for determination. Thus, it is imperative that the competent authority refuse consent on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

Additional Comments

I am writing to formally object to the proposed offshore wind farm development near the island, based on concerns about the potential impact on the health and wellbeing of those who live there.

The island community is uniquely shaped by its natural environment. The open seascape, uninterrupted horizons, and low levels of industrial noise contribute significantly to both physical and mental health. Many residents have chosen to live there specifically for the peace, clean air, and restorative qualities that come from

being closely connected to nature. There is growing recognition that such environments play an important role in reducing stress, supporting mental clarity, improving sleep quality, and promoting overall wellbeing.

The introduction of a large-scale wind farm in close proximity to the island risks undermining these benefits. Concerns include the visual impact of turbines altering the natural seascape, as well as noise pollution—both airborne and low-frequency—that may travel across water and affect nearby communities. For residents who already value and depend on a tranquil environment, even subtle, persistent disturbances can have cumulative effects on stress levels, sleep, and overall quality of life.

Additionally, the sense of remoteness and escape that defines island living may be diminished. This has implications not only for residents but also for visitors who come seeking rest and rejuvenation, contributing to the local economy in a way that aligns with the island's natural character.

While I recognise the importance of renewable energy and the need to transition toward more sustainable sources, it is essential that developments are carefully sited to avoid disproportionate impacts on small, environmentally sensitive communities. The potential health and wellbeing costs to those living on the island should be given significant weight in any planning decision.

I respectfully urge decision-makers to fully consider these impacts and to prioritise the protection of the unique environmental qualities that support the health of the island 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: 96C449AC

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 lacks completeness and does not give a clear or dependable account of the potential environmental impacts of the proposed development. There is significant uncertainty due to the use of a flexible Project Design Envelope, which avoids commitment to specific details such as turbine dimensions and layouts. This uncertainty hinders a consistent worst-case scenario analysis and compromises the overall integrity of the assessment. Consequently, the public and the competent authority are unable to grasp the full scope of the environmental effects that the project may cause.

The application depends heavily on mitigation strategies, monitoring plans, and management measures that have not been outlined. By seeking consent based on the promise that environmental damage will be mitigated later, the application prevents any thorough assessment of the effectiveness of these measures or consideration of residual impacts. This postponement of essential information until after consent is granted is unacceptable from a procedural standpoint and undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined before any decisions are made.

There are notable gaps in evidence, such as insufficient baseline data, methodological limitations, and a reliance on assumptions instead of solid, site-specific evidence. This lack of information creates uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficient detail leads to an unclear picture of cumulative and worst-case impacts and introduces scientific uncertainties that conflict with statutory requirements.

Therefore, the application does not fulfil the evidential standards set by the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation calls for the precautionary principle to be applied, particularly concerning protected species and vulnerable habitats. Moreover, the proposal does not satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application does not satisfy the statutory requirements of the Environmental Impact Assessment regime, particularly with regard to the assessment of alternatives. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative account of the project's

evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a significant lack of transparent and evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has considered the potential of locating turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental impact, the failure to conduct such analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

Further deficiencies are evident in the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that there has been no application of mitigation by design, which has led to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether there are less harmful and more suitable alternatives available. Without a comprehensive alternatives assessment, it cannot be asserted that the proposal constitutes a sustainable or policy-compliant solution.

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

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 concerning ornithology is fundamentally flawed, exhibiting substantial gaps in evidence and internal contradictions that compromise its conclusions. The west coast of the Isle of Lewis is known for hosting seabird populations of international importance, many of which are already in decline. However, the application fails to convincingly establish that these species will not suffer adverse effects. The proposed development is situated within vital foraging areas and migratory routes, yet the assessment does not adequately address the risks associated with displacement, collision, or habitat loss.

A critical inconsistency is evident in the application, where the developer asserts that there will be no significant adverse effects while simultaneously presenting a case for derogation under the Habitats Regulations, which is required only when significant harm is anticipated. This contradiction raises serious doubts regarding the reliability of the assessment and suggests that its conclusions lack adequate support from the evidence provided.

Insufficient evidence is presented to show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is not comprehensively recognised, and reliance on modelling techniques injects uncertainty, particularly for species facing serious decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Locating turbines within a recognised migratory corridor introduces a substantial risk, effectively acting as a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of continuous mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory aspects reveal that the application does not satisfy the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the identified deficiencies signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly contradicts national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of impacts, leading to the overarching conclusion that the application fails to fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely deficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic perspective, reducing heritage to a collection of isolated, unchanging features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in 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, yet the assessment inaccurately describes them as static entities, overlooking their ongoing significance, usage, and the development's effects on their surroundings. This misunderstanding results in an incomplete cultural evaluation and fails to account for their importance to community

life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These critical aspects of identity are entirely omitted, representing a substantial gap in the evaluation. Without acknowledging these factors, the true cultural impact of the proposed development cannot be fully grasped.

Concerns regarding community rights and engagement also arise. The Gaelic-speaking population embodies a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to adhere to established participatory principles in cultural and environmental decision-making.

Additionally, there is a notable procedural oversight in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority is unable to meet its legal obligation to assess the social, cultural, and economic effects on the island community. This alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, clearly violates policy expectations.

In summary, the neglect to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory duties results in a substantial evidential void. The cultural ramifications of the development have not been properly examined, and the application fails to provide a solid foundation for assessing the genuine cultural cost of 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 West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, conveying a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application inadequately represents the magnitude of the visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The level of

impact and its significance in the context of such a sensitive landscape have not been properly conveyed.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact is understated, thereby undermining the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated entities neglects their interdependence and results in an incomplete assessment of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is inconsistent with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any claim of policy compliance.

The identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, rather than capable of reduction to an acceptable level through mitigation.

In conclusion, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is significantly lacking in detail, failing to adequately evaluate the potential environmental effects. It involves considerable seabed preparation and installation works in a challenging high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful assessment of their effectiveness or adequacy.

This reliance on vague future measures is alarming, particularly in light of the sensitive receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to detail how these risks will be prevented, managed, or monitored.

Moreover, there exists uncertainty about the extent and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without robust modelling and clearly defined management strategies in place, it is impossible to ascertain the scale, duration, or ecological consequences of these impacts. This uncertainty is extended to potential effects on sensitive marine species and habitats that have already been identified in broader assessments.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application obstructs the ability to evaluate whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and their mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These failings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life lacks the necessary detail and fails to provide a thorough evaluation of the ecological or socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a significant fishing industry. However, the application does not sufficiently demonstrate how these uses and habitats can be preserved or maintained without causing considerable disruption.

One major concern is the assumption made within the application that fishing activity can be displaced without any repercussions. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional pressure that such displacement would create. This oversight is critical,

as it poses risks of overfishing in other locations and may have broader economic ramifications for the local fishing fleet. A clear and evidence-based assessment is essential for understanding the potential impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction activities. The use of high-energy hammer piling over a prolonged duration is expected to disturb a wide area, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is a serious issue; however, the application minimizes the importance of these effects without adequate supporting evidence.

In addition, the application reveals a notable inconsistency. While it acknowledges the requirement for licences to allow harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction raises doubts about the reliability of the assessment and brings into question its adherence to the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

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

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

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment contribute to an incomplete and unreliable evaluation. These shortcomings prevent a comprehensive understanding of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not fully address the impacts stemming from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is clear, yet these elements are evaluated in isolation, leading to a fragmented analysis that diminishes the understanding of the overall environmental and socio-economic implications.

Included in the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the development of access

infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, which serves as an important carbon reservoir and an ecologically significant habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs the proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap concerning biodiversity protection.

The proposal further raises serious concerns regarding carbon balance. Disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and fails to show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure across active croft land presents potential conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the proposal.

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

In summary, the division of project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thus impeding lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in shaping environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting that is visible over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The application

does not assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, representing a significant omission given the importance of dark skies to the area's identity and the growing sector of astro-tourism.

Equally concerning is the complete lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can result in disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study fails to evaluate how this aviation lighting could adversely affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, also face vulnerability from artificial lighting, yet this risk has not been addressed. Without site-specific night-time data, a critical gap in understanding ecological impacts remains.

The failure to assess nocturnal impacts makes it 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, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which aims to protect natural places and ensure environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as night-time character is an essential component of the environment.

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

TOURISM

The application for the proposed development presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences on a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are motivated 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 tourism.

Tourism in the area has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and currently supports more than 1,000 jobs, comprising up to 16% of the island's economy. Nevertheless, the application does not explore how the

anticipated industrialisation of the seascape and a decline in environmental quality may affect Tourism Gross Value Added or broader economic resilience. This lack of analysis inhibits the ability to ascertain whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the application fails to adequately consider the significance of environmental quality in fostering tourism. This includes the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the rising demand for nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment only exacerbates this shortcoming, resulting in a critical gap in understanding the potential impacts on this recognised and growing segment of the local economy.

For an island community with limited economic diversification, the insufficient evaluation of tourism impacts bears broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the need to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Collectively, these shortcomings—including the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependency of the island—culminate in a significant evidential gap. This gap hampers a thorough assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key 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 biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive

understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Islands Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial 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 consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

There are so many things wrong with this proposal that I don't really know where to start.

1) The impact on cetaceans has not fully been investigated. In one document the prospers noted that they might 'kill, injure or disturb' up to 140 Risso's dolphins, at an absolute maximum we only have 500. Having studied the species in these waters for the past 20 years, I have a catalogue of and know, around 380 individual dolphins. Losing 140 of them would be catastrophic and without a doubt, lead to population collapse.

2) Other species of cetacean and marine mammal use these waters for feeding, breeding and socialising; disrupting their preferred habitat would be detrimental to their

conservation.

3) One of the magical things about these islands are the breathtaking views, sunsets, archaeological and heritage sites... siting wind turbines so close to the shore is madness and the idea is from someone who has probably never even been to these islands, let alone would have to live in close proximity to them. To my understanding there have been no alternative sites proposed, this is of concern.

4) Tourism is a main stay of this island and installing such a wind farm would significantly impact this income generator for local communities.

5) Residents in the Isle of Lewis pay significantly more for their electricity than any other household in the UK yet are sited where 'their' electricity is coming from?

6) Again, the impacts on marine life have not been considered. This is a financial decision not one that involves local communities and wildlife.

7) Given the proposed location and associated weather conditions and the equipment being considered, these turbines are not well suited to this location and would not function optimally.

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: 23995C3F

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

Dear Sir/Madam

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

Fundamentally, the application lacks a sufficient evidential basis to support a lawful determination. There are critical gaps in environmental data, with baseline information proving limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their 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 are not backed by adequate evidence.

The proposal presents clear and substantial conflicts with 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. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These policy conflicts directly affect the statutory tests required for consent and weaken the ability of the competent authority to determine that the development is acceptable from a policy perspective.

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 environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is reliant on an undefined design envelope, which raises significant concerns regarding its environmental assessment. Without commitment to specific turbine dimensions, layouts, or configurations, the proposal introduces considerable uncertainty. This lack of specificity compromises the integrity of the Environmental Impact Assessment Report, as it does not enable a consistent application of a worst-case scenario, hindering both the public and the competent authority's understanding of the environmental impacts that may arise from the development.

Furthermore, there is a troubling deferral of essential information regarding mitigation measures, monitoring strategies, and management plans, which have not yet been defined. Seeking consent on the premise that environmental harm will be addressed at a later stage precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a practice is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before determination.

Evidential deficiencies are also present within the report, characterised by gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant deficiencies that undermine its reliability and completeness in understanding the ecological receptors of the West Lewis coastal environment. This area is known for being biologically active and sensitive, yet the baseline data provided is incomplete,

and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of relevant species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One major area of concern is the handling of otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active utilisation of coastal regions for foraging and movement. Due to the inadequate consideration of their core foraging ranges and behavioural patterns, the assessment fails to adequately evaluate the potential disturbances that could arise from construction activities, noise, and heightened levels of human activity. This gap in understanding significantly undermines the claims regarding the absence of significant effects on this species.

Further issues arise with the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, especially under Atlantic conditions. Such an approach is likely to lead to an underestimation of the presence of these sharks when compared to established land-based observations, which indicate that these waters are frequently used by them. By neglecting to incorporate or thoroughly consider this data, the assessment further compromises the baseline and weakens the conclusions drawn.

Due to these methodological shortcomings, conclusions suggesting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data also hinders the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This contributes to uncertainties regarding the true scale of risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not meet the necessary requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies does not allow for the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these findings, granting consent would not be lawful.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions severely diminishes its reliability. These inadequacies impede a thorough evaluation of the impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking the necessary evidence and containing numerous internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. However, the

application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself. 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 questions about the validity of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, especially concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is insufficient and behavioural responses are not well understood.

The placement of turbines within a recognised migratory corridor further exacerbates the risk by effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently assess the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question, as the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and undermines a lawful conclusion in support of consent.

In summary, the identified deficiencies reflect a lack of adherence to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable, due to methodological weaknesses and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment fundamentally undermines the evaluation of social impacts, health, and wellbeing related to this proposal. The developer has commissioned a Social Impact Assessment that included local residents in focus groups; however, the complete report remains unpublished. This significant

evidential gap prevents both the public and the competent authority from fully understanding the social risks identified in the developer's own research.

Summaries that are available reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are therefore not speculative. The lack of transparency regarding the full assessment restricts proper scrutiny of the findings and hinders the ability to assess their importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating a risk of "cultural loss." Despite this recognition, such impacts have not been adequately integrated into the main application or given the necessary attention. The failure to disclose the complete Social Impact Assessment thus obscures the true human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are substantial. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be jeopardised. The application, by withholding this vital information, lacks a complete evidential basis to appropriately evaluate the balance between benefits and detriments.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development must foster positive health outcomes and prevent harm; however, the evidence available suggests the existence of adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a critical omission within the application and a failure to satisfy the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation hinders a lawful determination and reinforces the argument that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of

remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence suggests that certain viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage.

These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application fails to adequately assess the impacts on fisheries and marine life, lacking a strong evaluation of both ecological and socio-economic consequences. The coastal waters off West Lewis are home to a vibrant marine ecosystem and a thriving fishing industry. However, the proposal does not show how these habitats and uses can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available or capable of supporting the increased pressure. This is a critical gap, as such displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction. Extended high-energy hammer piling may disturb species over large distances, affecting dolphins among others. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application minimizes these effects without sufficient evidence.

There is a notable inconsistency in the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet impacts are described as negligible. This contradiction raises questions about the reliability of the assessment and compliance with the Habitats Regulations, especially regarding anticipated harm that may require legal authorization.

Moreover, the application does not take into account cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove compliance 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, making it impossible to conclude that this proposal constitutes sustainable development.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application contribute to an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines and onshore works are linked but assessed separately, leading to a fragmented view of the environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities include excavation in areas of deep peat, especially within Barvas Moor, which is important for carbon storage and biodiversity. The application fails to provide a thorough assessment of these impacts, which hinders understanding of the project's environmental footprint.

Excluding or postponing the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires that all parts of a project be considered together, but separating offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully recognised.

There are significant risks to sensitive habitats, such as machair systems and peatland areas, which are under policy protection. The application does not show that it has fully assessed impacts on these habitats or that it has implemented appropriate avoidance measures, creating a notable gap in biodiversity protection.

The proposal also raises issues concerning carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy goals. This issue is not adequately addressed in the application, which fails to demonstrate a beneficial overall carbon balance.

Moreover, routing infrastructure through active croft land may conflict with existing land use and legal rights. There is no evidence that necessary consents or processes have been initiated, which raises concerns about the deliverability and legality of the project.

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

Overall, the separation of project components, the absence of a comprehensive assessment, and insufficient evidence on environmental and land use impacts make this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism, particularly in relation to emerging sectors like astro-tourism. The introduction of permanent red aviation lighting, visible over long distances, would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity, this absence represents a serious gap in the overall landscape and environmental evaluation. Moreover, there is no analysis of the potential impacts 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, which can cause disorientation and increase the risk of collisions. The lack of any lighting impact assessment or phototaxis study means that potential effects on these species remain unexamined.

This situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts, making it impossible to ascertain whether protected species or designated sites might face adverse effects. The evidential standard required to exclude these potential adverse effects cannot be met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which emphasizes the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the ecological framework. Collectively, the absence of assessments related to dark skies and nocturnal wildlife creates a significant evidential gap, resulting in an incomplete application that cannot support a lawful determination.

TOURISM

The proposal fails to adequately assess the impacts on tourism, a vital component of the Isle of Lewis economy. Tourism, which has seen a substantial increase from £65 million in 2017 to over £81.5 million, supports more than 1,000 jobs and constitutes up to 16% of the island's economy. The application acknowledges that 86% of visitors are attracted to the scenery yet does not provide a quantified evaluation of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or economic contributions.

Furthermore, there is a notable deficiency in understanding the significance of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies. These elements are crucial for enhancing visitor experiences and have relevance for emerging markets such as nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment deepens this gap, leaving key impacts on a recognised and growing segment of the local economy unexamined.

The implications of failing to assess tourism impacts extend beyond the economic

sphere, affecting employment opportunities, local businesses, and community sustainability in an island community with limited economic diversification. The lack of a compliant Island Communities Impact Assessment means that these vulnerabilities have not been addressed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impacts and the necessity to illustrate net benefit. Additionally, it contradicts strategic goals that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the combination of unquantified tourism impacts, inadequate assessment of environmental influences on visitor behaviour, and a disregard for the island's economic dependencies creates a significant evidential gap. This gap obstructs a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a material omission. These issues 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 direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats,

and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed project would lead to substantial and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or utilise the necessary regulatory provisions to demand the submission of the missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is completely 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: 3BB1AAEA

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

Dear Sir/Madam

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

The application lacks a solid evidential basis necessary for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework inhibits a clear understanding of potential significant effects. This, coupled with the reliance on unspecified mitigation measures, renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with established policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine that the development meets policy acceptability.

The scale of this proposal is unprecedented in the area, with large turbines situated in close proximity to the shoreline, which introduces serious concerns regarding landscape capacity, visual impact, and environmental consequences. In light of the insufficient information, reliance on undefined mitigation, evidential weaknesses, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in several critical areas, resulting in an unreliable account of the potential environmental effects of the proposal. There is a significant lack of commitment to specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope. This uncertainty undermines the integrity of the assessment, making it difficult for both the public and the competent authority to fully understand the environmental impacts that may arise from the development.

The application depends on various mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent based on the promise of addressing environmental harm at a later stage hinders any meaningful evaluation of effectiveness or the assessment of residual impacts. This deferral to post-consent stages is unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires significant effects and mitigation to be established prior to decision-making.

Moreover, there are notable evidential deficiencies, including gaps in baseline data and limitations in the methodology. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of the impacts. This is particularly concerning where conclusions of negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

As a result, the application does not meet the evidential threshold set by 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 fails to comply with National Planning Framework 4, which includes provisions for biodiversity protection and environmental integrity, as it is unclear whether impacts have been fully assessed or if adequate safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements set out in the Environmental Impact Assessment regime. It lacks a structured comparison of realistic alternatives based on environmental effects, instead presenting a narrative of project evolution. This method does not confirm that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is no clear, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline is particularly sensitive, and the significance of proximity to shore in determining impact means that the absence of such analysis makes it impossible to conclude that the proposed location is the least damaging option.

The deficiencies in the application extend to cable routing and landfall assessment as well, with insufficient evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive areas. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on measures after the design phase.

Consequently, the application fails to show that environmental harm has been minimised through the choice of site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution.

From a policy viewpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is fundamentally flawed and does not offer a comprehensive understanding of the ecological receptors present in the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is inadequate. The methodologies employed fail to effectively capture important information about species presence, behaviour, and habitat use, leading to an unreliable evidential foundation for assessing potential impacts.

There is a significant oversight concerning otters, a European Protected Species. The application does not adequately recognise their usage of coastal areas for foraging and movement. Without proper consideration of their core foraging range and behaviours, the assessment does not thoroughly evaluate the potential impacts of construction disturbance, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

The assessment also falls short in evaluating basking sharks, primarily due to the

reliance on aerial surveys, which carry a significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate their presence when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate relevant data weakens the reliability of the conclusions reached and contributes to an incomplete baseline.

These methodological weaknesses mean that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders the assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, there is uncertainty regarding the actual risks 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. The uncertainty present precludes the ability to discount adverse effects beyond reasonable scientific doubt, which necessitates invoking the precautionary principle. Given these conditions, consent cannot be legally granted.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These shortcomings inhibit a thorough evaluation of the impacts on marine ecology and protected species and indicate that the application is lacking a sound evidential basis.

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 cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The application reduces heritage to isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

Culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are misrepresented in the assessment. These locations serve as active sites of burial and spiritual practice, yet they are classified as static features. This mischaracterisation neglects their current use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and dismissing their importance within community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These aspects are integral to the area's identity but have been entirely omitted from the assessment, creating a significant gap. Without addressing these factors, the true cultural impact of the development remains poorly understood.

Concerns extend to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement questions the legitimacy of the assessment and neglects established principles regarding participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any lawful determination impossible.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural consequences of the development have not been adequately examined, and the application does not establish a sufficient foundation for evaluating the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency regarding social impacts, health, and wellbeing, significantly undermining its evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This absence creates an evidential gap that hinders both public understanding and the competent authority's ability to grasp the extent of social risks identified in the developer's research.

Residents have reported experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement with the community and are not based on speculation. However, the failure to release the complete assessment restricts proper scrutiny of its findings and limits the determination of their significance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these social impacts have not been fully integrated into the application or given due consideration. The withholding of the full Social Impact Assessment conceals the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment

process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functioning could be affected. Without the complete dataset, the application fails to provide a robust evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant; the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw in the application and a failure to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, coupled with documented existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The presence of these turbines would create a continuous industrial landscape, fundamentally altering the character of this environment and resulting in a permanent and irreversible transformation.

The assessment provided fails to adequately reflect the magnitude of the visual change that would occur. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the qualities of naturalness and remoteness. This assessment does not convey the true level of impact, particularly in the context of such a sensitive landscape.

Methodologically, there are concerns regarding how visual viewpoints have been selected and presented. It appears that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of underestimating the magnitude of visual impact, thus calling into question the reliability of the assessment.

Another critical deficiency is the failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing

Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment considers these sites in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This issue presents not just a visual impact but also a broader cultural and spatial harm that has not been adequately explored within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change associated with the turbines is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertions of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within a high-energy Atlantic environment necessitates substantial seabed preparation and installation works, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead depends on the development of mitigation and contingency measures after consent has been granted, which limits any effective assessment of their potential adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns, particularly in relation to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks associated with sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately detail preventive, control, or monitoring measures.

Moreover, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, assessing the extent, duration, or

ecological consequences of these impacts becomes impossible. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the broader context.

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and corresponding mitigation must be evaluated before consent is granted, and the absence of this information precludes a lawful determination. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the failure to define mitigation measures, the inadequacy of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life as presented in the application is inadequate and lacks a thorough examination of ecological and socio-economic implications. The West Lewis coastal waters are home to a rich marine ecosystem and support a vibrant fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved or maintained without causing significant disruption.

A major concern is the premise that fishing activities can be relocated without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures that may arise. This gap is critical, as such displacement could lead to overfishing in other areas and may adversely affect the local fishing fleet's economic stability. Without a robust, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling; nevertheless, the application diminishes the importance of these potential effects without adequate supporting evidence.

Moreover, there exists a notable contradiction within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, yet the impacts are simultaneously categorised as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where harm is expected to an extent that requires legal approval.

Additionally, the assessment does not adequately address cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a detailed evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy perspective, the application fails to show adherence to the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, thereby precluding any conclusion that the proposal is sustainable.

In summary, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies results in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal consists of offshore turbines and various onshore works, which are integral to the project. However, the assessment of the onshore infrastructure is materially incomplete, as it fails to account for the full extent of impacts associated with this single integrated project. The separation of the offshore and onshore elements leads to a fragmented evaluation, obscuring the true scale of the environmental and socio-economic effects involved.

Onshore works entail cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The application does not offer a comprehensive assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to provide a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered collectively. However, the distinction between offshore and onshore elements means the cumulative impacts on peatlands, habitats, and communities are not fully understood.

There are also significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This situation represents a clear evidential gap concerning biodiversity protection.

The proposal raises additional concerns regarding carbon balance. The disturbance of peatland releases stored carbon, which may result in a carbon debt, contradicting the objectives of renewable energy development. The application fails to adequately address this matter or show that the overall carbon balance remains beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting, which will be visible over long distances and will create a continuous and intrusive "wall of light" effect across the western horizon. This alteration will fundamentally impact the night-time environment of the West Lewis coastline, an area known for its exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. The significance of dark skies to the area's identity, alongside the growth of emerging tourism sectors such as astro-tourism, makes this omission particularly concerning. Consequently, there is a critical gap in understanding the overall landscape and environmental impacts of the proposal.

Moreover, there is no assessment of how the proposed lighting may affect nocturnal wildlife. Key species such as 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 lighting impact assessment or phototaxis study, failing to examine the potential consequences of aviation lighting on these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates the situation, as it does not address nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data is a significant shortcoming that impedes a comprehensive understanding of ecological impacts.

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

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

Overall, the lack of assessment concerning dark skies and nocturnal wildlife presents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient to support a lawful determination.

TOURISM

The application under consideration presents a concerning deficiency in its assessment of tourism impacts, which are crucial to the economy of the Isle of Lewis. Tourism is a vital sector, heavily reliant on the island's unspoiled coastline, stunning landscapes, dark skies, and overall sense of remoteness. Although the application acknowledges that a staggering 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how the proposed large-scale offshore infrastructure could influence visitor numbers, their behaviours, or the overall economic contributions they make.

The significance of tourism on the island cannot be overstated, with growth reported from £65 million in 2017 to over £81.5 million, contributing to the support of more than 1,000 jobs and accounting for up to 16% of the local economy. However, the application neglects to model the potential impacts of industrialising the seascape and the associated loss of environmental quality on the Tourism Gross Value Added, as well as on the broader economic resilience of the region. In the absence of this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or rather threaten an already established and flourishing sector.

Moreover, the assessment disregards the critical role of environmental quality in sustaining tourism. Unspoiled landscapes and dark skies enhance visitor experiences, particularly in emerging markets such as nature-based tourism and astro-tourism. The

lack of a Dark Skies Assessment exacerbates this oversight, creating a significant gap in understanding the impacts on this recognised and expanding segment of the local economy.

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

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

All these factors combine to illustrate the absence of a robust quantification of tourism impacts, an inadequate assessment of environmental drivers influencing visitor behaviour, and a disregard for the island's economic dependencies. This results in a critical evidential gap that hampers a thorough evaluation of the economic effects, ultimately leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards of sustainable development when evaluated against statutory obligations, national policy, and evidential requirements. The application echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasizes biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in many areas.

A complete and reliable evidential basis for determination is absent, revealing critical gaps in baseline data. The continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of important impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects contribute to an incomplete Environmental Impact Assessment. This deficiency hinders a comprehensive understanding of potential significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, nor does it adequately address health and wellbeing impacts. Furthermore, the absence of tourism impact modelling means that a net economic benefit cannot be evidenced. Inadequate assessment of the cumulative impact of both offshore and onshore elements obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, along with inconsistencies within the data, fail to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns that engage the precautionary principle and prevent a lawful determination regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A4F1F1FE

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 appropriate marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report alongside other supporting documents, revealing significant deficiencies relating to planning, environmental aspects, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with existing statutory requirements, national policies, and the tenets of sustainable development.

The application does not furnish an adequate evidential basis necessary for a lawful determination. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent, with several key elements of the proposal remaining undefined. The application's use of a flexible design framework obfuscates the potential significant effects, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects due to a lack of robust supporting evidence.

There exist clear and significant conflicts with policy. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not establish that the national requirements for safeguarding biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies directly challenge the statutory tests necessary for consent, thereby compromising the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces large turbines situated in close proximity to the shoreline, which raises substantial concerns regarding the landscape capacity, visual dominance, and environmental impact. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, and reliable account of the likely environmental effects associated with the proposal. A significant concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and undermines the integrity of the assessment, preventing the consistent application of a worst-case scenario. As a result, the impacts presented may not accurately reflect what will ultimately be constructed, hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed subsequently prevents any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established prior to determination.

The report also exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the scale and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application fails to meet the evidential threshold required under the Habitats Regulations, as it cannot exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of environmental effects, meaning that the competent authority cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The failure to provide a structured and reasoned assessment of alternatives significantly undermines the application. It does not meet the statutory requirements of the Environmental Impact Assessment regime and presents a narrative of project evolution rather than a detailed comparison of realistic alternatives based on their environmental effects. This shortcoming results in a lack of clarity regarding whether less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, the assessment lacks a transparent and evidence-based comparison of different offshore locations, development scales, and design configurations. The application does not convincingly demonstrate that the developer has adequately considered the possibility of placing turbines further offshore, which could mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the absence of this analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

This inadequacy is also evident in the evaluation of cable routing and landfall, as there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis points to an absence of mitigation by design, relying instead on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal aligns with sustainability or policy compliance.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, especially in relation to the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant omission is the failure to properly recognise and assess otters, a European

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. Unfortunately, the ornithological assessment accompanying the application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to adequately demonstrate that these vulnerable species will not be adversely affected, particularly in light of the risks associated with displacement, collision, and habitat loss.

A fundamental contradiction exists within the application itself, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying

evidence. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the inadequate understanding of the behavioural responses of these birds. The siting of turbines within a recognised migratory corridor introduces a considerable risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor, nor does it consider the potential effects on species with relatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is insufficient and does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The assessment takes a simplistic view, treating heritage as isolated and unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, but the assessment categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding bond between the community and the coastal environment. These aspects are essential to the identity of the area but are not

addressed, representing a major oversight. Without acknowledging these elements, the cultural impact of the development cannot be fully grasped.

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

A vital procedural error is the failure to provide a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic sites and areas. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and legal obligations creates a substantial evidential gap. The cultural consequences of the development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current evaluation of social impacts, health, and wellbeing is lacking in transparency and is materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report has not been published. This omission creates a significant evidential gap, making it difficult for both the public and the competent authority to grasp the full range of social risks identified by the developer's research.

Available summaries suggest that residents are facing measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are not speculative in nature. Nonetheless, the failure to release the complete assessment inhibits thorough scrutiny of the findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with concerns about "cultural loss" highlighted in the developer's findings. Despite this, these social impacts have not been adequately integrated into the application or

afforded the necessary weight. The absence of the full Social Impact Assessment clouds the understanding of the genuine human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is critical for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a thorough evidential basis to assess the balance of benefits and harm.

From a policy viewpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm; however, the evidence available indicates that adverse effects already exist and have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is not achievable.

The procedural consequences are notable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This lack of information constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, along with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This undermines the ability to make a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

concern that the visual impacts have been understated, which undermines the credibility of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that will be prepared after consent, which does not allow for a meaningful evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. This makes the reliance on undefined future measures particularly troubling. The application does acknowledge risks, such as sediment mobilisation and accidental chemical or oil spills, but it does

not provide enough information on how these will be prevented, controlled, or monitored.

Furthermore, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also relates 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 delaying contingency planning until after consent, the application hinders the ability to evaluate whether appropriate safeguards are established to manage pollution events. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation before consent. The lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and the uncertainty regarding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions effectively.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure related to this project is incomplete and fails to adequately consider the full range of impacts from what constitutes a single integrated development. The offshore turbines and the associated onshore works are fundamentally connected, yet they are evaluated in isolation, leading to a fragmented analysis that obscures the true scale of the environmental and socio-economic repercussions.

Onshore components include cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, a significant carbon store and ecologically delicate habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components are evaluated collectively; however, the disconnection between the offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under current policy. The application does not sufficiently demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This represents a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance related to the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not adequately address this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application provides no evidence that the necessary consents or processes have been initiated, casting doubt on both deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project in its entirety 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 lack of evidence indicating that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of nocturnal wildlife, which is critical given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting. The impacts of this lighting, specifically its potential to disorient these species and increase the risk of collision, have not been evaluated. Additionally, the ornithological assessment is based solely on daytime survey data, neglecting nocturnal activity and the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been considered. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

The introduction of permanent red aviation lighting visible over long distances would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment of the West Lewis coastline. This area is characterised by exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and tourism value. The application does not address the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission of such assessments is significant,

particularly as dark skies are important for the area's identity and for emerging sectors such as astro-tourism.

This lack of assessment leads to a clear gap in the overall landscape and environmental evaluation. Without understanding the nocturnal impacts, it is impossible to determine if protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and complicates lawful determination.

Moreover, from a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, which emphasises the protection of natural places and environmental quality. The oversight also undermines the broader assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes 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 as defined by statutory obligations, national policies, and evidential standards. It echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. This current application is presented under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of local communities.

There are substantial deficiencies in the evidential basis for the proposal, including critical gaps in baseline data and the utilisation of an undefined design envelope. The application relies on unspecified mitigation measures and fails to consider essential impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering the ability to fully comprehend likely significant effects or residual impacts.

Furthermore, the application contains notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contravenes the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Additionally, there is a failure to establish a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making a lawful conclusion regarding acceptable impacts unattainable.

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

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

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

Additional Comments

I went to school in lower barvas, I have family living on Loch street, and I visit regularly. If I am as disturbed by the possibility of this project coming to fruition as I am, I dread to think how people living locally must feel.

It's my belief that that the statement of support for this project by the local community was fabricated or at the very least hugely exaggerated.

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: 826CE8F2

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 consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a full, transparent, and reliable account of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development constructed, which obstructs both the public and the competent authority from comprehending the true extent of the environmental effects.

Furthermore, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consent is thus being sought with the understanding that any environmental harm will be addressed at a later stage, which precludes a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and is contrary to the objectives of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation are clearly established prior to any determination.

There are also major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority is not equipped to determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents an assessment of marine ecology and protected species that is fundamentally flawed and fails to deliver a comprehensive understanding of the

ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential foundation to evaluate potential impacts effectively.

Notably, the assessment neglects to properly acknowledge the presence of otters, which are classified as a European Protected Species. It fails to assess their active usage of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns results in an inadequate evaluation of potential impacts stemming from construction disturbances, noise, and increased activity. Such omissions compromise the conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, which suffers from a reliance on aerial surveys that introduce considerable detection bias, particularly in challenging Atlantic conditions. This methodology is likely to significantly underestimate the presence of basking sharks when compared to established land-based observations that demonstrate frequent utilisation of these waters. The lack of integration or thorough consideration of such pertinent data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings give rise to conclusions about negligible or non-significant effects that rest on assumptions rather than rigorous evidence. The inadequacy of baseline data also hampers the ability to assess cumulative and indirect impacts meaningfully, including those stemming from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the real extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced by these deficiencies hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment as a whole unreliable. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species, affirming that the application lacks a sufficient evidential basis.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow view, treating heritage as separate, static entities, rather

than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is 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 are classified merely as static features in the assessment. This classification neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their vital role in community life.

Additionally, the assessment does not adequately address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These factors are crucial to the area's identity but have been entirely disregarded, resulting in a significant oversight. Without considering these elements, the cultural ramifications of the proposed development cannot be comprehensively understood.

Concerns also arise surrounding community rights and engagement. The Gaelic-speaking population is recognised as possessing a distinct cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement compromises the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that influence cultural and environmental interests.

A serious procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, conveying a strong sense of remoteness. The introduction of large-scale

turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and fails to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application inadequately represents the magnitude of the visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and erode the defining qualities of naturalness and remoteness. The level of impact and its significance in the context of such a sensitive landscape have not been properly conveyed.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the viewpoints selected may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of visual impact is understated, thereby undermining the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated entities neglects their interdependence and results in an incomplete assessment of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is inconsistent with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any claim of policy compliance.

The identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, rather than capable of reduction to an acceptable level through mitigation.

In conclusion, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The proposed development raises significant concerns regarding its effects on fisheries and marine life, particularly given the waters off the West Lewis coast, which host a vibrant marine ecosystem and a thriving fishing industry. The application fails to adequately evaluate the ecological and socio-economic impacts, leading to a worrying lack of clarity about how these vital marine uses and habitats will be protected from substantial disruption.

A critical flaw in the proposal is the assumption that fishing activities can be shifted without adverse effects. The absence of evidence regarding the availability of alternative fishing grounds that are accessible and capable of bearing additional pressure is alarming. This gap in the assessment is crucial, as it raises the spectre of overfishing in other locations, which could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based appraisal, the potential ramifications for fisheries and the livelihoods they support remain uncertain.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged duration is likely to disturb marine life over extensive areas, adversely affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is a grave issue that the application appears to minimise, lacking the necessary evidence to support such downplaying.

There is also a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This contradiction severely undermines the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Furthermore, the assessment inadequately considers the cumulative impacts stemming from various pressures, including habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and local socio-economic conditions.

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

In summary, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the

application render the assessment incomplete and unreliable. Such shortcomings obstruct a thorough evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is characterised by significant inadequacies that undermine its compliance with the principles of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application echoes the central issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to address these critical concerns.

A thorough examination reveals that the application lacks a comprehensive and reliable evidential foundation necessary for determination. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a clear understanding of potential significant effects or residual impacts.

Moreover, procedural failures are evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment constitutes a significant omission, hindering the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal also conflicts with the National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently evaluated, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals exhibit internal inconsistencies. The evidential threshold necessary to definitively rule out adverse effects has not been met, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to substantial and irreversible alterations to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline,

deterioration of dark skies, disruption of cultural and visual connections, and negative impacts on tourism signify permanent changes that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is essential that the competent authority either refuse consent on these grounds or activate the relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

I am very concerned about the impact on the marine life that will be had. As well as this it will take away from the culture and beautiful landscape that is special to the island and brings in tourism. For the community, it will impact the environment negatively

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: F5539374

