Member of the public 1857

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regulations. A review of the Environmental Impact Assessment Report and accompanying documentation has revealed significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is proposed 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 from the scale, proximity, and design of the project, particularly regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, and the baseline information is both limited and inconsistent, leaving many key elements of the proposal undefined. The flexible design framework utilised inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures means that their potential effectiveness cannot be accurately assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not underpinned by robust evidence.

There exist substantial conflicts with established policy. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in regards to biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, reliance on undefined mitigation, evidential shortcomings, 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 invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, resulting in an inadequate and opaque account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders the ability to consistently apply a worst-case scenario and diminishes the reliability of the assessment. Consequently, the impacts outlined may not accurately represent the actual development, leaving both the public and the competent authority unable to fully comprehend the true extent of environmental effects.

Additionally, the application's heavy reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans leads to consent being sought on the premise that environmental harm will be addressed after approval. This deferral of essential information to post-consent stages is unacceptable from a procedural standpoint and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Moreover, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies introduce uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and data gaps renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies inhibit a lawful and thorough evaluation of environmental effects, preventing the competent authority from making an informed decision based on the available information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is critically flawed and fails to deliver a thorough and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically active but also highly sensitive, yet the baseline data is insufficient and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the evaluation lacks a solid evidential basis for determining impacts.

A significant oversight concerns otters, which are classified as a European Protected Species. The application inadequately acknowledges their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently analysed. This flaw undermines any conclusions about the absence of significant effects on this species.

The assessment of basking sharks also exhibits critical deficiencies, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when juxtaposed with established land-based observations that indicate frequent usage of these waters. The failure to integrate or adequately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings mean that the assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as the assessment of protected species has not been executed properly. The uncertainty introduced by these deficiencies precludes the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of this, granting consent would be unlawful.

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, culminating in the conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application fails to recognise this connection, approaching cultural heritage and community identity in a fundamentally inadequate manner. Rather than viewing heritage as dynamic and ongoing, it treats it as a collection of isolated and static assets, neglecting their social, cultural, and spiritual significance within the community.

This shortcoming is particularly evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places of burial and spiritual practice, yet the assessment mischaracterises them as static features. It does not take into account their continued use, meaning, or the

impact that development may have on their setting, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Additionally, the assessment omits consideration of intangible cultural heritage, such as the Gaelic language and traditions, as well as the community's enduring relationship with the coastal environment. These aspects are vital to the identity of the area but are entirely absent from the evaluation, creating a significant gap in understanding the cultural impact of the development.

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

Moreover, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is mandated by the Islands (Scotland) Act 2018, and without it, the competent authority cannot legally evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination of the application.

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

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, leaving the true cultural cost of the proposal unaddressed.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing related to the proposal is insufficient and lacks necessary transparency. While the developer conducted a Social Impact Assessment, including focus groups with local residents, the complete report has not been made public. This results in a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified by the developer's research.

Available summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts arise from direct engagement with the community and are not merely speculative. However, without disclosing the complete assessment, proper scrutiny of the findings is not possible, which limits the capacity to assess their significance in the decision-making

process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion, with “cultural loss” noted in the developer's findings. Unfortunately, these effects have not been fully considered in the main application or given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the actual human and social costs associated with the development.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid causing harm, but the available evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The implications of these procedural shortcomings are serious. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material failure within the application and does not meet the evidential requirements set by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse effects, renders the assessment inadequate and unreliable. This lack of comprehensive information hinders a lawful determination, reinforcing the conclusion that the application does not rest on sufficient evidence.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is alarmingly inadequate and does not truly capture the extent of change or the sensitivity of the environment that would be affected. The West Lewis coastline is characterised by its expansive Atlantic horizon, its unspoilt nature, and its profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to portray the scale of this visual disruption accurately. The turbines would dominate views from residential areas, historic sites, and popular coastal spots, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment neglects to adequately express the

significance of this impact within such a vulnerable landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This oversight risks understating the visual impact's magnitude and calls into question the reliability of the assessment.

Another serious shortcoming is the failure to consider the interconnected nature of the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these as separate assets rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural relevance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and breaking their connection to the natural horizon. This impact transcends mere visual disruption, representing a significant cultural and spatial harm that the application does not adequately address.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which relates to the protection of natural environments and historic sites. The scale of proposed change is fundamentally at odds with the necessity to preserve landscape character, visual amenity, and the contexts of culturally important locations. Furthermore, the absence of a thorough worst-case assessment raises serious doubts about compliance with policy requirements.

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

In summary, the assessment fails to represent the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. These significant deficiencies preclude a reliable evaluation and reinforce the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate 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 are to be defined post-consent,

which obstructs any meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures raises considerable concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

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

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application undermines the ability to evaluate whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and compromises the capacity of the competent authority to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be assessed prior to granting consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of well-defined mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts render 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 proposed development poses serious risks to marine life and the fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector. However, the application does not adequately demonstrate how these habitats and uses will be protected from significant disruption.

A major concern is the assumption that fishing activities can be shifted without negative consequences. The application lacks evidence to show that alternative fishing grounds exist, are accessible, or can handle the additional pressures of displaced fishing. This gap in information is critical, as forcing displacement could lead to

overfishing in other areas and have detrimental economic impacts on the local fishing fleet. Without a solid, evidence-based evaluation, the repercussions for fisheries and livelihoods remain unclear.

Moreover, the project poses considerable threats to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is anticipated to disturb marine life across extensive areas, particularly affecting dolphins. The expected disruption to a significant portion of the local bottlenose dolphin population raises substantial worries, yet the application minimises these effects without adequate evidence.

There is also a notable inconsistency within the application that acknowledges the necessity for licences to allow harm to European Protected Species while concurrently claiming that the impacts are negligible. This contradiction calls into question the credibility of the assessment and brings up concerns about adherence to the Habitats Regulations, especially where anticipated harm may require legal authorisation.

Additionally, the assessment does not take into account the cumulative impacts of various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the absence of evidence regarding fishing displacement, underestimation of noise impacts, and internal contradictions make the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment. This significant change to the visual landscape of the West Lewis coastline, which is known for its exceptionally dark skies, raises serious concerns about the impact on environmental quality, cultural identity, and tourism, particularly for emerging sectors like astro-tourism. However, the Environmental Impact Assessment fails to assess the impact of this lighting on visual amenity and landscape character, which is a critical omission given the importance of dark skies to the area’s identity.

Moreover, the absence of an evaluation regarding the effects of artificial lighting on nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm

Petrel, and Leach's Storm Petrel are notably sensitive to light pollution due to phototaxis, which can lead to disorientation and heightened collision risk. The application does not include any analysis of lighting impacts or phototaxis studies, thus neglecting to assess how aviation lighting may affect these vulnerable species and potentially increase mortality rates.

The ornithological assessment's reliance on daytime survey data further exacerbates this issue, as it fails to capture nocturnal activity and the associated risks. Other species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. Without site-specific night-time data, understanding the ecological impacts remains critically incomplete.

In the absence of a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and preventing a lawful determination.

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

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

TOURISM

The application presents a significant evidential gap regarding the assessment of tourism impacts, which is crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and the prevailing sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences. This oversight extends to the failure to include a Dark Skies Assessment, creating a substantial void in understanding the implications for an acknowledged and developing aspect of the local economy, such as nature-based tourism and astro-tourism.

Given the limited economic diversification in this island community, the neglect in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the standards required for sustainable development according to statutory duties and national policy. This proposal mirrors the significant issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Now, despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in crucial areas.

There are critical gaps within the evidential basis for determination. The design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects, have been overlooked. This results in an incomplete Environmental Impact Assessment, leaving the potential significant effects and residual impacts inadequately understood.

Procedural failures are evident throughout the proposal. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations set by the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment constitutes a serious omission. Such deficiencies hinder the competent

authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential standard required to definitively rule out adverse effects has not been met, engaging the precautionary principle and undermining the validity of any conclusions regarding acceptable impacts.

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

In light of these factors, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prohibits a lawful and evidence-based decision. Therefore, it is imperative that consent for the Spiorad na Mara Offshore Wind Farm application is refused entirely.

Additional Comments

Introduction of these MASSIVE turbines will ruin the natural beauty of the island and the decision is being made without consideration of the people who will be living with the consequences.
Insufficient evidence has been provided to demonstrate:

Potential impact on tourism industry
Sustainability for housing and local amenities if the project is approved
What tangile benefits will be for LOCALS
how this will impact the environment and ecosystem.

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: B3B7FFC4

Member of the public 1858

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

The application lacks an adequate evidential basis necessary for lawful determination. There are notable gaps in critical environmental data, with baseline information appearing limited and inconsistent, while key elements of the proposal remain unspecified. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the available documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering unsupported the claims of negligible or non-significant effects.

Additionally, there are substantial conflicts with established policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines situated near the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and not capable of supporting a lawful determination. In light of these factors, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and does not provide a clear or accurate account of the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent based on the premise that environmental harm will be managed later obstructs a meaningful evaluation of effectiveness and the assessment of residual impacts. Deferring crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established before any determination is made.

In addition, there are substantial evidential gaps, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects lack robust supporting data. The failure to provide adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential standards set by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it has not been established that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, the absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The application presents a narrative account of project evolution instead of a structured, reasoned comparison of realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging solutions is concerning.

There is a significant lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not demonstrated that they have seriously considered the option of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such an analysis prevents any determination that the proposed siting is the least damaging option.

The inadequacies extend to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, with undue reliance on post-design mitigation measures instead.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to assess 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 policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system. However, 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.

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

In addition, the assessment of basking sharks is deficient. The reliance on aerial

surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially 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, weakening the reliability of the conclusions presented.

These methodological limitations lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers meaningful assessment of cumulative and indirect impacts, including seasonal variation and interactions within the wider ecosystem. This creates uncertainty about the true 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 protected species have not been properly identified or assessed. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, engaging the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

Overall, 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 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 compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development has not adequately addressed the cultural heritage and community identity associated with the West Lewis coastline, which serves as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. The assessment reduces heritage to isolated, static assets and fails to recognise their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places for spiritual practice; however, they are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, as well as the potential impacts of development on their setting, leading to an incomplete evaluation of cultural effects and overlooking their importance in community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

There are additional concerns related to community rights and engagement. The

Gaelic-speaking population holds a unique cultural identity that aligns with characteristics of an Indigenous People. Nevertheless, there has been no process of Free, Prior and Informed Consent, which undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

A critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot legally fulfil its duty to evaluate the social, cultural, and economic effects on the island community, preventing a lawful determination of the proposal.

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

Overall, the failure to evaluate living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately assessed, leaving the application without a sufficient basis to evaluate the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the entire evaluation process. The developer has conducted a Social Impact Assessment, which included focus groups with local residents, but the comprehensive report remains unpublished. This significant gap in evidence restricts both public understanding and the ability of the competent authority to grasp the complete range of social risks identified in the developer's own research.

Residents are reportedly experiencing considerable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not mere speculation. However, the absence of the full assessment limits the opportunity for thorough examination of these findings, which is essential for informed decision-making.

Moreover, there is growing sentiment that the proposal threatens community identity and cohesion, with findings highlighting "cultural loss." Despite the significance of these impacts, they have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This situation has serious implications for the Environmental Impact Assessment

process. A thorough understanding of the social, economic, and health impacts is crucial, especially for developments of this magnitude that may affect community character. The failure to provide complete data means the application lacks a comprehensive evidential basis for weighing benefits against potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy is unproven.

The procedural ramifications are significant as well. The competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a major omission within the application and fails to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside the documented existing adverse impacts, results in an incomplete and unreliable evaluation. This deficiency hampers a lawful determination and reinforces the assertion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would fundamentally alter the landscape. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The assessment of the potential seascape, landscape, and visual impacts is deficient. It fails to represent the scale of change or the sensitivity of the environment adequately. The turbines would create a continuous industrial presence that would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and remoteness of the region.

Methodological concerns exist regarding the selection and presentation of visual viewpoints. It appears that some viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, compromising the reliability of the assessment.

Moreover, the assessment overlooks the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are linked visually and spatially to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence and leads to an incomplete evaluation of the impacts on their cultural significance and setting. The proposed industrialisation of the seascape would sever these connections, disrupting how heritage assets are experienced in relation to the natural horizon. This change represents a broader cultural and spatial harm that the application has not

adequately addressed.

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 incompatible with requirements to safeguard landscape character and visual amenity as well as the setting of culturally significant sites. The lack of a robust worst-case scenario assessment undermines any claim of compliance with policy.

Additionally, the identified impacts cannot be effectively mitigated. The height, scale, and proximity of the turbines would ensure that their presence is dominant and unavoidable. The resulting changes would be fundamental and permanent, rather than manageable to acceptable levels through mitigation efforts.

Overall, the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation, reinforcing 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, leading to an incomplete evaluation of potential environmental effects. It involves extensive seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application suggests relying on future mitigation and contingency measures, which will be established after consent is granted. This approach hinders any meaningful assessment of their adequacy or effectiveness prior to approval.

The sensitivity of the receiving environment amplifies the issues associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies. Additionally, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological impacts of these plumes cannot be determined, raising further concerns for sensitive marine species and habitats identified in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the 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 necessary mitigation measures must be evaluated before consent, and the lack of this information means a lawful determination cannot be achieved.

Ultimately, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that presents substantial risks to marine species and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing sector. However, the assessment of fisheries and marine life is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. Notably, the application does not adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure from displaced activities. This oversight is critical, as it poses a risk of overfishing in other areas and could lead to wider economic repercussions for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposed development introduces considerable risks to marine species, particularly through the underwater noise produced during construction activities. The use of high-energy hammer piling over an extended period is likely to disturb marine life across extensive areas, with potential effects on species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. However, the application tends to downplay the significance of these impacts, lacking sufficient supporting evidence.

There is an evident inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, particularly where anticipated harm may require legal authorisation.

Additionally, the assessment does not account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining

the overall impact on marine ecosystems and socio-economic conditions remains unattainable.

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 that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, ultimately precluding any conclusion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not take into account the full extent of impacts from a single integrated project. The offshore turbines and onshore works are connected, but they have been assessed separately. This approach does not reveal the true scale of environmental and socio-economic effects.

The onshore works involve cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities include excavation in areas of deep peat, particularly in Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, limiting understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application fails to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all aspects of a project be considered together. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Sensitive habitats, such as machair systems and peatland environments, are at significant risk and are subject to policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This highlights a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland releases stored carbon, potentially creating a carbon debt that contradicts renewable energy development goals. The application does not sufficiently address this matter or prove that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that necessary

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

From a policy standpoint, the failure to assess the project as a whole and ensure protection of peatlands, habitats, and land use interests is inconsistent 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, lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting is visible over long distances and significantly impacts the character of the West Lewis coastline, which is known for its exceptionally dark skies. The dark skies are integral to the area's environmental quality, cultural identity, and tourism potential.

Crucially, the assessment does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is especially concerning given the emerging significance of astro-tourism in the region. The failure to address these impacts creates a notable gap in the overall environmental and landscape assessment.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and their mortality risk remain unexamined.

This oversight is further compounded by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and associated hazards. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leads to a critical deficit in understanding the ecological impacts of the proposed development.

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 cannot be achieved, thereby engaging the precautionary principle and precluding a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4 regarding the protection of natural spaces and environmental quality. It further undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

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

TOURISM

The Isle of Lewis tourism sector has seen significant growth, with its economic contribution rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the local economy. Despite this, the application fails to adequately assess the impacts of proposed large-scale offshore infrastructure on this vital sector. It acknowledges that 86% of visitors are drawn by the area's stunning scenery, yet it does not quantify how industrial developments could affect visitor numbers, behaviours, or the overall economic contributions made by tourism.

Furthermore, the assessment does not consider the crucial role of environmental quality in enhancing the visitor experience, such as the significance of unspoiled landscapes and dark skies. The neglect of a Dark Skies Assessment leaves a substantial gap in understanding the impacts on emerging markets like nature-based tourism and astro-tourism, both of which are important for local economic sustainability.

In an island community with limited economic diversification, the lack of assessment regarding the impacts on tourism raises concerns for local employment, businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that the economic vulnerabilities of the area have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessary demonstration of net benefit. It contradicts strategic objectives that position tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis prevents a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary criteria for sustainable development when measured against statutory obligations, national policy, and evidential standards. It mirrors the significant issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Although this application is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is lacking within the application. It contains critical gaps in baseline data, continues to employ an undefined design envelope, and relies on unspecified mitigation measures. Additionally, it omits crucial impact pathways related to nocturnal wildlife, complete onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, preventing a full understanding of significant effects or residual impacts.

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

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

There are significant uncertainties regarding environmental risks. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing a lawful conclusion on the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information gaps, along with policy conflicts and unresolved environmental risks, preclude a lawful, evidence-based decision. Therefore, a formal request is made for the refusal of the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

The overall impact to the islands will be multifaceted and affect everybody living, working and visiting the isles. The effect on nature will be long lasting and effect multiple eco structures.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 55D99655

Member of the public 1859

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

Dear Sir/Madam

This letter formally objects to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and related materials, revealing significant planning, environmental, cultural, and procedural shortcomings. The wind farm is proposed for the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project with statutory requirements, national policies, and sustainable development principles due to its scale, proximity to the shore, and design.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Moreover, several key elements of the proposal remain undefined. The flexible design framework used complicates the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal contradicts the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate issues, and environmental integrity. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to affirm that the project aligns with policy standards.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the coastline, raises serious concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential gaps, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or reliable overview of the anticipated environmental

effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As such, consent is sought based on the premise that environmental harm will be managed later. This approach undermines any meaningful evaluation of effectiveness or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also notable evidential deficiencies, which include gaps in baseline data, limitations in methodology, and the use of assumptions rather than site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where findings of negligible or non-significant effects are presented without robust supporting data. Insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, which includes stipulations on biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application inadequately addresses the assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental impacts, it offers merely a narrative of project evolution. This method does not prove that less harmful options have been properly identified or assessed in preference to more damaging solutions.

The lack of a transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations is evident. Particularly, there is no indication that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The West Lewis coastline's sensitivity and the critical role that proximity to shore plays in determining impact highlight the shortcomings of this analysis. Consequently, one cannot conclude that the proposed siting represents the least damaging option.

These shortcomings also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been properly explored 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 comparative analysis suggests that mitigation by design has not been employed, leading to a reliance on post-design mitigation measures instead.

As a result, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy prevents the competent authority from assessing whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly lacking, leading to an unreliable understanding of ecological receptors in this sensitive and biologically active marine system. The methodologies employed have proven inadequate in capturing essential aspects such as species presence, behaviour, and habitat use, resulting in incomplete baseline data. Consequently, this deficiency undermines the evidential basis necessary for evaluating potential impacts.

A notable gap exists concerning otters, recognised as a European Protected Species. The application does not appropriately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns leaves the potential impacts of construction disturbances, noise, and increased activity insufficiently evaluated, thereby challenging any conclusions regarding the absence of significant effects on this species.

The assessment of basking sharks is similarly flawed, as it relies on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This reliance risks underestimating their presence when compared to well-established land-based observations that indicate frequent utilisation of these waters. The failure to adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions about negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, as well as seasonal variation and broader ecosystem interactions. This uncertainty obscures the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies inhibits the possibility of excluding adverse effects beyond reasonable scientific doubt, necessitating the precautionary principle. In such circumstances, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions collectively 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 lacks a sufficiently robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development is fundamentally flawed, as the ornithological assessment reveals significant gaps in evidence and internal contradictions that undermine its conclusions. Situated within key foraging areas and migratory pathways, the development threatens internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected.

A notable contradiction arises within the application, where the developer asserts there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when substantial harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that its conclusions lack support from the underlying evidence. Moreover, the assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been adequately recognised, and the reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The

methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a further significant risk. It effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment fails to properly consider the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold needed to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling inadequacies, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and prevents a lawful conclusion in favour of consent.

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

Ultimately, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately address the intertwined nature of community identity and cultural heritage along the West Lewis coastline, viewing it merely as a collection of static assets instead of a vibrant cultural landscape where environment, language, and tradition are deeply interconnected. It neglects the ongoing social, cultural, and spiritual functions of heritage within the community.

Significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated as mere static features despite their active roles as places of burial and spiritual significance. This oversight leads to a misrepresentation of their meaning and continued use, resulting in an incomplete understanding of the cultural effects of the proposed development and ignoring their importance to community life.

Furthermore, the application disregards intangible cultural heritage, including the Gaelic language and local traditions, as well as the longstanding relationship the community maintains with the coastal environment. These vital components of the area's identity are missing from the assessment, representing a major shortfall that hampers a complete understanding of the development's cultural implications.

Concerns also extend to community rights and engagement. The Gaelic-speaking

population embodies a distinct cultural identity that aligns with the characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the integrity of the assessment and neglects established principles for involving communities in decisions impacting their cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a significant procedural failure and a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination legally questionable.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. By failing to consider both tangible and intangible heritage and to acknowledge living cultural practices, the application deviates from essential policy standards.

In summary, the cumulative lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts associated with the development have not been adequately evaluated, leaving the application without a sufficient basis for determining the genuine cultural cost of the proposal.

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not sufficiently reflect the extent of change or the sensitivity of the environment it addresses. The West Lewis coastline is characterised by an open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

The application falls short in representing the scale of the visual changes anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would detrimentally affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment fails to adequately convey the significance of these impacts within such a sensitive landscape context.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby undermining its reliability.

Moreover, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation disregards their interdependence and results in an incomplete evaluation of impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital connections, changing the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The anticipated scale of change is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy requirements.

It is evident that the impacts identified cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Therefore, the anticipated changes are fundamentally permanent and cannot be reduced to an acceptable level through any mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies regarding the assessment of construction and pollution risks, failing to offer the necessary details for evaluating potential environmental effects. There is a substantial requirement for seabed preparation and installation works within a high-energy Atlantic environment, yet the application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures is especially alarming, given the sensitivity of the receiving environment along the West Lewis coastline. This area supports clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply enough detail on the methods to prevent, control, or monitor these incidents.

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures when making a determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation must occur prior to consent, and any absence of such 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 defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a diverse marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show how these habitats and uses can be preserved without significant disruption.

One major concern lies in the assumption that fishing activities can be relocated without repercussions. There is no evidence presented to suggest that alternative fishing grounds exist, are accessible, or can sustain increased pressure. This gap in information is crucial, as the potential for overfishing in other areas due to displacement poses risks to the local fishing fleet's economic viability. An absence of a clear, evidence-based assessment means that the consequences for both fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is expected to cause significant disturbances across wide areas, potentially affecting species like dolphins. The predicted impact on

a large portion of the local bottlenose dolphin population raises serious issues, yet the application minimizes these concerns without adequate supporting evidence.

There is also a notable inconsistency in the application regarding the acknowledgement of the need for licenses to permit harm to European Protected Species, while simultaneously characterizing impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about adherence to the Habitats Regulations, especially where expected harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 and the National Marine Plan. It does not adequately illustrate that the development can coexist with existing marine users or avoid adverse impacts on marine biodiversity, which hinders 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 collectively render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes significant onshore infrastructure works, such as cabling across protected moorland and the construction of a substation near Stornoway, which requires access through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is known for its ecological sensitivity and status as a significant carbon store. However, the application does not provide a thorough assessment of the impacts associated with these works, leading to an incomplete understanding of the overall environmental footprint of the project.

Furthermore, the assessment of onshore impacts has been excluded or postponed, hindering the proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are evaluated in conjunction, yet the current separation of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities. This separation is problematic, as it prevents a holistic view of the environmental and socio-economic implications.

Concerns also arise regarding the potential risks to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application fails to demonstrate that all impacts on these habitats have been

thoroughly assessed or that suitable avoidance measures are in place, resulting in a notable gap in evidence related to biodiversity protection.

Additionally, the disturbance of peatland associated with the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence of the necessary consents or processes being initiated, which raises questions about the feasibility and legality of implementation.

From a policy standpoint, the fragmented assessment approach undermines the adherence to the National Marine Plan and National Planning Framework 4, as it does not adequately demonstrate the protection of peatlands, habitats, and land use interests. The inability to show that impacts can be avoided or mitigated further weakens the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that is visible over great distances. This lighting would create a continuous "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is also no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts creates a notable gap in the landscape and environmental assessment.

Moreover, the application does not assess the impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are sensitive to artificial lighting, which can disorient them and increase collision risks. Without a lighting impact assessment or a phototaxis study, there is no evaluation of how the proposed aviation lighting may affect these species or potentially increase mortality rates.

This omission is further exacerbated by the use of daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species like Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data results in a crucial gap in understanding the

ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The assessment presented in the application lacks a comprehensive evaluation of the tourism impacts, which are critical to the Isle of Lewis economy. With tourism reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness, it is concerning that the application fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of the sector. Notably, 86% of visitors are attracted by the scenery, yet this connection is not sufficiently explored.

The growth of tourism in the region has been remarkable, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the potential consequences of industrialising the seascape and the subsequent loss of environmental quality on Tourism Gross Value Added, as well as wider economic resilience, are overlooked in the application. This lack of modelling raises concerns about whether the proposed development would ultimately yield a net economic benefit or detriment to this vital sector.

Moreover, the assessment neglects to consider the environmental quality factors that underpin tourism, including the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a critical gap in understanding how these factors contribute to a recognised and expanding area of the local economy.

In a context where the island community faces limited economic diversification, the oversight of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not

been properly evaluated, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to illustrate net benefit. Furthermore, it conflicts with strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale 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 application falls short.

There is a significant lack of comprehensive and reliable evidential support for the determination of this application. Key baseline data is missing, the design envelope remains undefined, unspecified reliance on mitigation measures is noted, and important impact pathways have been overlooked, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of significant effects or residual impacts.

Procedural issues are also apparent. The omission of a compliant Island Communities Impact Assessment breaches statutory duty as per the Islands (Scotland) Act 2018, and the failure to reveal the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority’s ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural places, and cultural heritage preservation. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of net economic benefits due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements is incomplete, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential threshold necessary 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.

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

In summary, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, combined with policy inconsistencies and unresolved environmental risks, inhibit a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent based on these grounds or activate the appropriate regulatory measures to require the submission of the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0785FEDB

Member of the public 1860

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns about compatibility with statutory requirements, national policy, and sustainable development principles are paramount given the scale, proximity, and design of the project.

The application does not provide a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal are undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures raises questions about their efficacy. Consequently, the documentation fails to offer a comprehensive understanding of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack solid evidence.

There are evident and substantial policy conflicts as the proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The scale of the proposal is unprecedented for this location, with large turbines proposed in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. Taken as a whole, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have not been clearly outlined. Seeking consent under the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of effectiveness or residual impact assessment. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies are clearly established prior to the determination process.

There are also major evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This creates uncertainty around the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment conducted regarding marine ecology and protected species is significantly flawed, lacking a complete and reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity; however, the baseline data gathered is insufficient,

and the methodologies employed do not effectively capture the presence, behaviour, or habitat usage of various species. Consequently, there is a lack of a sound evidential basis for evaluating the potential impacts of the proposed development.

Notably, there is a critical oversight concerning otters, which are designated as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts resulting from construction disturbances, noise, and increased activity levels. This oversight diminishes the credibility of any conclusions made regarding the absence of significant effects on this species.

Further concerns arise in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, especially under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or appropriately consider this data contributes to an incomplete baseline and undermines the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks posed to marine species and their habitats.

From a regulatory viewpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty generated by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, granting consent cannot be justified within a lawful framework.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development presents significant flaws in the ornithological assessment, which is marked by gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not

face adverse effects as a result of the proposed development. Key foraging areas and migratory pathways are situated within the project's location, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

There exists a fundamental contradiction within the application, where the developer asserts that there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack support from the underlying evidence. Furthermore, the assessment fails to provide adequate evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not sufficiently accounted for, and the dependence on modelling approaches adds uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is incomplete and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor poses an additional and significant risk, as it effectively creates a barrier within a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately evaluate the long-term consequences of sustained mortality within this corridor or the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined 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, thus preventing a lawful conclusion in favour of consent.

Moreover, the deficiencies noted signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, as it is hindered by internal inconsistencies, methodological weaknesses, and insufficient evidence. Consequently, these shortcomings obstruct a robust evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is 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 social impacts, health, and wellbeing assessment for the development is seriously lacking and does not provide the necessary transparency for a valid evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant gap in evidence, preventing both the public and the competent authority from fully understanding the social risks revealed in the developer's own research.

Summaries available suggest that local residents are facing measurable levels of stress, anxiety, and concern due to the proposal's size and proximity. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the absence of the full assessment hinders thorough scrutiny of these findings and affects the ability to assess their significance in the decision-making process.

Evidence also suggests that the development is seen as a threat to community identity and cohesion, with the developer's findings identifying "cultural loss." Nevertheless, these impacts have not been adequately included in the main application or given the proper weight. The failure to publish the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functionality. By withholding the complete dataset, the application does not provide a thorough evidential basis for evaluating the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should enhance positive health outcomes and avoid negative effects, yet the evidence presented indicates existing adverse impacts that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be established.

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

In summary, the non-disclosure of the full Social Impact Assessment, along with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and supports the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines along the West Lewis coastline, which is characterised by an open Atlantic horizon and an undeveloped, remote character. This development would create a continuous industrial presence that fundamentally alters this landscape, leading to a permanent and irreversible transformation. The assessment of seascape, landscape, and visual impacts associated with this proposal is significantly deficient, failing to capture the scale of change and the sensitivity of the surrounding environment.

The visual change resulting from the turbines would be substantial, dominating views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately convey the magnitude of this impact or its significance within such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may overlook the most sensitive receptors and worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This oversight suggests that the true magnitude of the visual impact may be understated, compromising the reliability of the assessment.

Moreover, the assessment inadequately addresses the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that shares visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their settings 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 not only results in a visual impact but also incurs broader cultural and spatial harm that has not been sufficiently assessed.

From a policy standpoint, this proposal contradicts the directives of National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change posed by the development is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario analysis further undermines any claims of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure that their presence is dominant and unavoidable. Consequently, the changes brought about by this proposal are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These deficiencies hinder a reliable evaluation and highlight that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding the assessment of construction and pollution risks, making it impossible to properly evaluate the potential environmental effects. Significant seabed preparation and installation works are planned for a high-energy Atlantic environment; however, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises significant concerns due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding its evaluation of marine life and fisheries, revealing a lack of robust assessment of both ecological and socio-economic impacts. The waters off the West Lewis coast host a vibrant marine ecosystem

alongside an active fishing industry, yet there is no evidence provided to assure that these critical habitats and activities can be protected from substantial disruption.

A notable flaw is the assumption that fishing activities can be displaced without repercussions. The application fails to demonstrate the availability or accessibility of alternative fishing grounds that could handle any additional pressures resulting from displacement. This lack of evidence is critical as it opens the door to potential overfishing in other areas, posing economic risks for the local fishing fleet. The impacts on livelihoods and fisheries remain inadequately understood due to the absence of a clear, evidence-based evaluation.

Moreover, the proposal presents considerable risks to marine species, particularly from construction-related underwater noise. The anticipated high-energy hammer piling over a prolonged duration is likely to create disturbances that reach significant distances, adversely affecting species such as dolphins. The expected impact on a substantial portion of the local bottlenose dolphin population raises serious concerns; yet, the application minimises the significance of these effects, lacking adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes those impacts as negligible. This contradiction raises alarming questions about compliance with the Habitats Regulations, especially where anticipated harm could necessitate legal authorisation.

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

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

Overall, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not adequately account for the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are fundamentally interconnected; however, their separate assessments lead to a disjointed evaluation,

obscuring the true magnitude of environmental and socio-economic consequences.

Key onshore components entail cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The lack of consideration for onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. The disjointed evaluation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully realised. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been considered, creating a significant evidential void regarding biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. This issue has not been adequately addressed by the application, nor has it been shown that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate protection of peatlands, habitats, and land use interests is inconsistent with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application. Collectively, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies. The dark skies not only contribute to the environmental quality of the area but also play a significant role in its cultural identity and tourism value.

A crucial oversight within the Environmental Impact Assessment is the complete lack of

evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the growing importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly significant. Furthermore, the assessment fails to address potential impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions.

The application does not include any lighting impact assessment or phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the likelihood of increased mortality. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has been overlooked. The absence of site-specific night-time data creates a critical gap in the understanding of ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and obstructing a lawful determination of the application.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, the lack of consideration for night-time character undermines the broader assessment of landscape and seascape impacts.

Overall, the absence of any assessment concerning dark skies and nocturnal wildlife presents a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

TOURISM

The assessment of tourism impacts associated with the proposed development is significantly lacking, failing to adequately evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the

application falls short by failing to model the potential impacts of industrialising the seascape and the resultant loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Furthermore, the assessment neglects to consider the critical role of environmental quality in enhancing the tourism experience, particularly the value of unspoiled landscapes and dark skies to visitors, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to examine the implications for tourism raises broader concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependency result in a notable evidential gap. This lack of comprehensive evaluation undermines the ability to draw robust conclusions about the economic effects of the proposal and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with sustainable development principles as outlined in statutory duties and national policy. Similar to the 2008 Lewis Wind Power proposal, which faced rejection due to unacceptable industrialisation, this application emerges under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing. However, it falls short in several critical areas.

The evidential basis provided is neither complete nor reliable, with notable gaps in baseline data and an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment lacks the necessary depth to offer a clear understanding of significant effects and residual impacts.

Procedural issues further complicate the proposal. The absence of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the lack of a comprehensive Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is fundamentally at odds with the National Planning Framework 4, failing to assure the protection of biodiversity, natural places, and cultural heritage. It does not adequately address health and wellbeing impacts, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain both uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, contradictory. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

This proposal is poised to cause considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism signify permanent changes that cannot be sufficiently mitigated.

In light of these concerns, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, policy conflicts, and unresolved environmental risks impede a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 90962468

Member of the public 1861

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 proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The documentation provided fails to supply a sufficient evidential foundation for a lawful assessment. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework utilised does not facilitate a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, there is no comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are notable and serious conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and overall environmental integrity. These issues challenge the statutory tests required for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal in the area, with substantial turbines situated near the shoreline, raises significant worries about landscape capacity, visual impact, and broader environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the proposed development's environmental effects. A flexible Project Design Envelope, lacking specific turbine

dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity, making it impossible to ascertain a worst-case scenario, thereby hindering both public understanding and the competent authority's evaluation of the true environmental impacts.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise of addressing environmental harm at a later stage obstructs a thorough evaluation of effectiveness and the assessment of residual impacts. This postponement of essential information contravenes the procedural integrity of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before any determination is made.

There are also crucial evidential shortcomings, including insufficient baseline data, methodological limitations, and the reliance on assumptions rather than site-specific evidence. Such gaps result in uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without robust data to support these conclusions. This lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that fail to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not comply with National Planning Framework 4, which includes stipulations about biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. It lacks a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead providing a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Furthermore, the absence of a transparent, evidence-based comparison of alternative offshore locations, development scales, and design configurations raises serious

concerns. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The West Lewis coastline's sensitivity and the critical role of proximity to shore in assessing impact make this lack of analysis particularly detrimental. Consequently, it is impossible to determine that the proposed siting is indeed the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than applying mitigation by design.

As a result, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This is a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive alternatives assessment, it cannot be claimed that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that further substantiates the conclusion that the application has not been adequately evaluated, thus failing to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active; however, 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 foundation for evaluating potential impacts.

There is a significant oversight regarding otters, which are a European Protected Species. The application does not adequately recognise or assess their active usage of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means the potential impacts of construction disturbances, noise, and increased activity have not been thoroughly evaluated. This flaw undermines any assertions regarding the absence of significant effects on this species.

Further shortcomings exist in the assessment of basking sharks, where a reliance on

aerial surveys creates a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underrepresent their presence, especially when juxtaposed with established land-based observations that demonstrate frequent usage of these waters. The neglect to incorporate or thoroughly evaluate such data leads to an incomplete baseline and compromises the reliability of the findings.

The methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on solid evidence. Moreover, the absence of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. The uncertainty involved prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In this context, granting consent cannot be justified lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps in evidence and internal inconsistencies, rendering its conclusions unreliable. 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 meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located near the proposed development, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a fundamental contradiction within the application, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. The assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been thoroughly considered, and the reliance on modelling approaches adds uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully

understood.

The positioning of turbines within a recognised migratory corridor introduces additional risks, effectively 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 effects of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to conclude that there would be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data gaps and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal directly at odds with national policy.

In summary, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a dynamic cultural landscape that integrates environment, language, tradition, and community. The application takes a narrow view, treating heritage merely as a collection of disconnected, static assets instead of acknowledging their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static features. This oversight neglects their ongoing significance and the implications of development on their surroundings, leading to an incomplete understanding of cultural effects and overlooking their importance in community life.

Additionally, the assessment fails to incorporate intangible cultural heritage elements, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. Such aspects are crucial to the area's identity but are completely omitted from the evaluation, which represents a major gap. Without including these factors, the cultural impacts of the development remain inadequately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, identifiable as an Indigenous People, yet no Free, Prior and Informed Consent process has taken place. The lack of meaningful engagement compromises the credibility of the assessment and does not align with accepted principles for participation in decisions affecting cultural and environmental interests.

Moreover, there is a critical procedural flaw in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This alone hampers a lawful determination.

From a policy standpoint, the deficiencies identified create a direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to assess both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear departure from policy stipulations.

Collectively, the oversight in evaluating living heritage, intangible cultural values, community rights, and legal obligations culminates in a notable evidential gap. The cultural impacts stemming from the development have not been thoroughly examined, and the application falls short of providing an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been published, leading to a significant evidential gap that obstructs both public understanding and the competent authority's evaluation of the social risks identified by the developer's own research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore not speculative. Nonetheless, the lack of full disclosure limits proper scrutiny of the findings and hinders the assessment of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with “cultural loss” highlighted within the developer’s findings. Despite this, these impacts have not been adequately integrated into the main application or given the necessary weight. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and

functioning are at stake. By withholding the full dataset, the application does not provide a complete evidential basis to weigh the balance between benefits and harm.

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

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

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally insufficient and does not reflect the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a persistent and prominent industrial presence, dramatically altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to convey the extent of this visual change adequately. The size and proximity of the turbines would overshadow views from residential areas, historical sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate this impact or its importance in the context of such a delicate landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. Evidence indicates that these viewpoints might not fully capture the most sensitive receptors or worst-case scenarios, especially regarding significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been downplayed, compromising the assessment's reliability.

Another critical shortcoming is the lack of consideration of the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment approaches these as isolated entities without recognising their

interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which heritage assets are perceived and altering their relationship to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with the National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude of change is not compatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and closeness of the turbines, their presence would be predominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that could be mitigated to an acceptable degree.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and fails to deliver a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not adequately demonstrate how these essential uses and habitats will be protected or maintained without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that suggests alternative fishing grounds are available or able to handle increased pressure. This lack of information is particularly concerning, as displacing fishing activities could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. An evidence-based assessment is necessary to understand the potential impacts on fisheries and local livelihoods.

Furthermore, the proposal poses considerable risks to marine species, especially due to underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to disturb marine life across extensive areas, with species such as dolphins likely to be significantly affected. The application fails to adequately address the predicted disturbance to a considerable portion of the local bottlenose dolphin population and downplays the significance of these effects without sufficient supporting evidence.

There is also an evident contradiction within the application regarding the licensing

needed to harm European Protected Species, while simultaneously asserting that such impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly in scenarios where harm may necessitate legal authorisation.

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

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

In summary, the deficiencies highlighted—such as the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies—render the assessment incomplete and unreliable. These issues obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes onshore infrastructure that is assessed separately from offshore turbines. This fragmented approach fails to capture the full extent of impacts from what is a single integrated project. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. However, by treating the offshore and onshore elements separately, the combined effects on peatlands, habitats, and local communities are not fully comprehended.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been assessed or that avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue

or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions about its feasibility and legality.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal includes the introduction of permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment of the West Lewis coastline, an area noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism value.

There is a significant absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies hold considerable importance for the area’s identity and for burgeoning sectors such as astro-tourism, and this omission represents a clear gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to investigate how the proposed aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential

standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission contradicts National Planning Framework 4, which addresses the protection of natural places and environmental quality. This gap also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

Overall, the failure to assess 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 unable to support a lawful determination.

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million. This sector supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this significance, the application does not evaluate how the industrialisation of the seascape and a potential decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains uncertain whether the proposed development would yield a net economic benefit or threaten a vital and expanding sector.

Furthermore, the assessment inadequately addresses the critical role of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience. The importance of emerging markets, such as nature-based tourism and astro-tourism, is overlooked, and the absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a lack of understanding regarding impacts on a recognised and growing component of the local economy.

The implications extend beyond tourism, affecting employment, local businesses, and community sustainability within an island community that already experiences limited economic diversification. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with

the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector, and fails to furnish adequate evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, to evaluate the environmental factors influencing visitor behaviour, and to consider the economic dependency of the island culminates in a significant evidential gap. This gap obstructs a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits significant deficiencies that render it unfit for determination. The application does not fulfil the requirements for sustainable development as prescribed by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. This new application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these concerns.

Critical gaps in baseline data undermine the evidential basis for determination. The continued reliance on an undefined design envelope and unspecified mitigation measures raises questions about the robustness of the application. Additionally, it omits vital impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are also notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a material omission that prevents the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies collectively contribute to the application being deemed unfit for determination.

The proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to illustrate that health and wellbeing impacts are acceptable, and it cannot provide evidence of 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 appropriately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are both significant and concerning. The assessments of marine ecology, seabirds, protected species, and marine

mammals lack completeness and internal consistency. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is set to induce 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 pose permanent effects that cannot be adequately mitigated.

In summary, the application demonstrates serious procedural and substantive inadequacies. The combined scale of information deficiencies, along with conflicts with established policy and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or utilises the appropriate regulatory provisions to mandate the submission of the missing information.

In light of these considerations, 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: C5FEE8CA

Member of the public 1862

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. A review of the Environmental Impact Assessment Report and its supporting documents reveals several material deficiencies related to planning, the environment, cultural considerations, and procedural matters. The development is set to take place off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which may not align with statutory requirements, national policy, or the principles of sustainable development.

The application does not provide a sufficient evidential basis for lawful determination. It lacks critical environmental data, has limited and inconsistent baseline information, and key elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not allow for a comprehensive understanding of potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by adequate evidence.

Substantial policy conflicts are evident in the proposal, which appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These inconsistencies are particularly apparent concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's policy acceptability.

The unprecedented scale of the proposal includes large turbines located close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the potential environmental

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking, failing to capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its unspoilt Atlantic horizon and a pronounced sense of remoteness. The proposed large-scale turbines, situated in close

proximity to the shoreline, would introduce a continuous industrial presence, fundamentally changing this character and resulting in a permanent alteration of the landscape.

The application inadequately portrays the extent of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within such a sensitive landscape.

Concerns are raised regarding the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not adequately reflect the most sensitive receptors or the worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This possibility raises doubts about the accuracy of the visual impact assessment, suggesting it may have been understated.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. The failure to acknowledge their interdependence leads to an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and affecting their relationship with the natural horizon. This represents not just a visual impact, but a deeper cultural and spatial harm that remains unaddressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change proposed is not aligned with the requirements to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case scenario assessment further weakens any assertions of compliance with policy.

It is evident that the impacts highlighted cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure that their presence remains dominant and unavoidable. The resulting transformation is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to adequately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

FISHERIES AND MARINE LIFE

The application concerning the development off the West Lewis coast reveals significant deficiencies in its assessment of fisheries and marine life, which undermines its reliability. The ecological evaluation does not adequately address the diverse marine ecosystem present in these waters, nor does it consider the active fishing industry. The failure to demonstrate how these vital uses and habitats can be protected or maintained without substantial disruption is concerning.

A notable flaw in the proposal is the assumption that fishing activities can be displaced without adverse effects. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate increased pressure. This absence of information is critical, as the potential for overfishing in different areas could have broader economic implications for the local fishing fleet. Without a solid, evidence-based assessment, the repercussions on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged period is expected to disturb a wide area, affecting species like dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these concerns without adequate supporting evidence.

The assessment contains an evident contradiction; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises the impacts as negligible. This inconsistency undermines the credibility of the evaluation and raises questions about adherence to the Habitats Regulations, particularly when anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures such as habitat disturbance, noise, and displacement of fishing activities. A thorough 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 compliance with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently show that the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

In summary, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings prevent an accurate evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning onshore infrastructure remains significantly inadequate, failing to account for the full range of impacts associated with what constitutes a single integrated project. The connection between offshore turbines and onshore activities is critical; however, their separate evaluations result in a fragmented methodology that obscures the overall environmental and socio-economic consequences.

Onshore components encompass cabling traversing protected moorland, the construction of a substation close to Stornoway, and related access infrastructure through sensitive landscapes. These undertakings involve excavation in regions of deep peat, notably within Barvas Moor, recognised as both a crucial carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's total environmental footprint.

Moreover, the omission or deferral of onshore impact assessments obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project must be evaluated collectively. Nonetheless, the delineation between offshore and onshore components results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. The application fails to illustrate that the potential impacts on these habitats have been fully examined or that suitable avoidance measures have been put in place, creating a significant evidential void concerning biodiversity protection.

The proposal also prompts concerns relating to carbon balance. The disruption of peatland leads to the release of stored carbon, which could result in a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or prove that the overall carbon balance remains advantageous.

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

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The incapacity to show that impacts can be avoided or mitigated further compromises the application's integrity.

When considered collectively, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and

land use impacts render this section of the application incomplete and unreliable, thus obstructing a lawful determination.

TOURISM

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

This sector has experienced considerable growth, with tourism revenue increasing from £65 million in 2017 to over £81.5 million and sustaining more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such an oversight prevents the determination of whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment does not adequately address the significance of environmental quality for tourism, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and foster emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding impacts on an acknowledged and growing component of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unevaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the economic dependencies of the island culminate in a significant evidential gap. This gap undermines a robust assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

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

There are evident procedural failures, including the lack of a compliant Island Communities Impact Assessment, which violates statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

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

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

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

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

Additional Comments

With no true benefits to islanders such as reduced electricity bills in an area of the highest fuel poverty in the UK is abhorrent.

With no true long term benefit to us is desperately sad and threatens to ruin the most wonderful place.

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: 2967E1D9

Member of the public 1863

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental impacts of the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations. This absence creates uncertainty and hinders the effective application of worst-case scenario assessments. Consequently, the presented impacts may not accurately reflect the final construction, making it difficult for both the public and the competent authority to grasp the full extent of the potential environmental effects.

Additionally, the application is contingent upon mitigation measures, management plans, and monitoring strategies that are currently undefined. Seeking consent with the expectation that these environmental harms will be addressed at a later stage undermines the possibility of a meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which mandates that likely significant effects and mitigation measures be clearly established before determination.

There are also profound evidential shortcomings within the assessment, including gaps in baseline data and limitations in methodology, as well as a reliance on assumptions rather than concrete, site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information prevents a clear understanding of cumulative and worst-case impacts and introduces a degree of scientific uncertainty that does not align with statutory requirements.

Moreover, these factors mean the application does not satisfy the evidential threshold established under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus engaged, especially in relation to protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is impossible to verify that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation strategies, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment suffers from significant deficiencies, leading to an incomplete understanding of ecological receptors in this biologically active marine system. The

methodologies employed fail to adequately capture the presence, behaviour, and habitat use of key species, which results in a lack of a solid evidential basis for evaluating potential impacts.

A major concern is the inadequate recognition and assessment of otters, a European Protected Species, particularly their active use of coastal areas for foraging and movement. The failure to account for their core foraging range and behaviour means that the implications of construction disturbance, noise, and increased activity have not been thoroughly examined. This raises doubts about the conclusions drawn regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks demonstrates further shortcomings, as it relies heavily on aerial surveys that are prone to detection bias under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations indicating a frequent use of these waters. The neglect to incorporate relevant data results in an inadequate baseline and undermines the reliability of the findings.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the genuine scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty created by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Therefore, consent cannot be lawfully granted under these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

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

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

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not adequately portray the sensitivity of the receiving environment or the scale of change involved. The coastline of West Lewis is characterised by an expansive Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines situated close to the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to properly convey the magnitude of visual change associated with the turbines. Their scale and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the visual impact has been underestimated, thereby compromising the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Key sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation rather than acknowledging their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual impact but a wider cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural spaces and historical assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a comprehensive worst-case scenario analysis further weakens any assertion of compliance with policy requirements.

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 overwhelming and inescapable. The resulting change is therefore fundamentally permanent, rather than something that could 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 inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate detail for assessing construction and pollution risks, rendering the evaluation of likely environmental effects incomplete. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will be prepared post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient information on preventative, controlling, or monitoring strategies.

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

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and obstructs the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures be assessed prior to consent; in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Ultimately, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts leads to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes development activities that could significantly disrupt the marine ecosystem and the fishing industry off the West Lewis coast, yet it lacks a robust assessment of the ecological and socio-economic impacts. The region is home

to a diverse marine ecosystem and an active fishing community, but the proposal fails to demonstrate how these critical uses and habitats will be protected or maintained.

A major concern is the assumption that displacing fishing activity can occur without adverse effects. The application does not provide evidence that there are alternative fishing grounds that are available, accessible, or capable of handling any additional pressure. This gap in evidence is critical, as it presents the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear and evidence-based assessment, understanding the potential impacts on fisheries and livelihoods remains incomplete.

The proposal also poses significant risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns; however, the application diminishes the importance of these impacts without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application 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, making it impossible to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes offshore turbines and various onshore works, which are part of a single integrated initiative. However, the assessment of these onshore infrastructure components is incomplete and does not account for the full impacts of the project. The offshore and onshore elements are intrinsically linked but are

examined separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which obscures the project's overall environmental footprint.

By not addressing or delaying the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components should be considered collectively. However, the separation of the offshore and onshore parts means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are notable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not adequately show that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been put in place, creating a significant gap in biodiversity protection evidence.

Additionally, there are concerns about the carbon balance. Disturbing peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is favourable.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, raising concerns about deliverability and legal compliance.

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

Overall, the separation of project elements, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this part of the application incomplete and unreliable, which impedes a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of dark skies and nocturnal wildlife, which is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are vital to the area's

environmental quality, cultural identity, and tourism value. By introducing permanent red aviation lighting that is visible over extensive distances, the proposal would create an intrusive "wall of light" across the western horizon, significantly altering the night-time environment.

Furthermore, there is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging sectors of astro-tourism highlights the significance of this omission. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to the lack of consideration for these impacts.

The proposal also neglects to evaluate the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial light, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a study on phototaxis means that there is no understanding of how aviation lighting could affect these species or contribute to increased mortality rates.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to 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 a thorough assessment of nocturnal impacts, it remains 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 cannot be met, thereby engaging the precautionary principle and precluding a lawful determination.

From a policy standpoint, the omission directly contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental component of the environment.

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

TOURISM

The 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 Spiorad na Mara Offshore Wind Farm proposal poses significant concerns regarding its compliance with sustainable development criteria as outlined by statutory obligations, national policies, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal fails to address fundamental requirements.

There are critical deficiencies in the evidential basis for determining the application. The reliance on an undefined design envelope, gaps in baseline data, unspecified mitigation measures, and the exclusion of essential impact pathways—such as nocturnal wildlife, complete onshore infrastructure, and the effects on tourism—render the Environmental Impact Assessment incomplete. Consequently, it does not provide a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal is also at odds with National Planning Framework 4, failing to safeguard biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative effects of offshore and onshore elements have not been adequately assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

Overall, the application is both procedurally and substantively inadequate for determination. The significant deficiencies in information, combined with conflicts with policies and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or exercise relevant regulatory provisions to mandate the submission of the required information.

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

Additional Comments

There seems to be an urgency to push this project through even if we all know the damage it will caused in all named aspects will be irreversible. There is NOTHING GREEN about this project. Only money in the pockets of a few, mostly from foreign lands. Sorry, but NO.

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: 7CC5EE23

Member of the public 1864

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, which reveals significant deficiencies in material planning, environmental, cultural, and procedural aspects. 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 rich cultural identity. Concerns regarding the scale, proximity, and design of the proposal raise questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application presents an inadequate evidential basis for lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and significant aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are evident, with the proposal appearing misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly linked to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines located 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 strategies, evidential weaknesses, and clear non-compliance with policy illustrates 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 incomplete and lacks a full, transparent, and reliable depiction of the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the application of a worst-case scenario. This compromises the integrity of the assessment, rendering the impacts presented potentially inconsistent with the actual development, thus hindering both public understanding and the competent authority's comprehension of the true environmental repercussions.

Consent is requested with a reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Such an approach results in environmental harm being addressed post-consent, thereby obstructing a meaningful evaluation of effectiveness and the assessment of residual impacts. This postponement of vital information to stages following consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly identified prior to determination.

Moreover, the application is characterised by significant evidential shortcomings, including gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, particularly where conclusions are drawn indicating negligible or non-significant effects without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unsubstantiated that impacts have been comprehensively assessed or that suitable safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and insufficient. These shortcomings obstruct a lawful and thorough assessment of environmental effects, thereby placing the competent authority in a position where it cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of a clear and structured comparison of viable alternatives based on environmental impacts, it offers a narrative detailing the project's evolution. This method does not show that less harmful options have been effectively identified, evaluated, and chosen over more damaging alternatives.

There is a notable absence of transparent, evidence-based comparisons concerning different offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal effects would likely be lessened. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in evaluating impacts, the lack of such analysis prevents any assertion that the proposed location is the least harmful option.

The shortcomings also apply to the assessment of cable routing and landfall, where there is inadequate evidence of a thorough exploration of alternative routes to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been prioritised, resulting in reliance on post-design mitigation methods.

Consequently, the application does not demonstrate that environmental harm has been reduced through thoughtful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant oversight that leads to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary comprehensiveness and reliability to accurately reflect the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the available baseline data is insufficient, and the methodologies employed do not effectively document species presence, behaviour, and habitat use. Consequently, the assessment fails to deliver a credible evidential basis for evaluating potential impacts.

One significant shortfall is related to otters, a European Protected Species. The

application neglects to adequately recognise and evaluate their active utilisation of coastal regions for both foraging and movement. Without a proper understanding of their core foraging areas and behavioural patterns, the assessment does not sufficiently address the possible effects of construction-related disturbances, noise, and increased human activity. This oversight compromises the assessment's conclusions regarding the lack of significant effects on otters.

Additionally, the evaluation of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces a substantial detection bias, particularly in the Atlantic's environmental conditions. This method is likely to result in an underestimation of the sharks' presence, especially when compared to established observations from land that show frequent use of these waters. The failure to incorporate or adequately consider this crucial data leads to an incomplete understanding of the baseline and diminishes the reliability of the findings presented.

These methodological shortcomings indicate that conclusions claiming negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, such as 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 viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the elimination of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These issues hinder a robust evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application does not possess a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis poses significant risks to internationally important seabird populations that are already declining. The ornithological assessment associated with this application is fundamentally flawed. It has notable gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The area is known for its key foraging zones and migratory pathways, yet the assessment fails to adequately evaluate the impacts of displacement, collision risk, or habitat loss for these species.

There is a critical contradiction in the application. The developer claims that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency

raises doubts about the reliability of the assessment and suggests that its conclusions are not backed by sufficient evidence.

Furthermore, the assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. It does not fully consider the importance of these feeding grounds, and its reliance on modelling approaches adds further uncertainty, particularly regarding species in severe decline like Kittiwakes and Fulmars. Methodologies employed appear likely to underestimate mortality rates, especially in situations where baseline data is incomplete and the behavioural responses of the species are not well understood.

The siting of turbines within a known migratory corridor adds another significant risk. This creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of ongoing mortality in this corridor, nor does it assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicate that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, making it impossible to lawfully conclude in favour of consent.

Moreover, the identified deficiencies show 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 directly conflicts with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues prevent a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken is overly simplistic, viewing heritage merely as a collection of static assets rather than appreciating their dynamic social, cultural, and spiritual significance within the community.

A significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, they are characterised merely as static features in the assessment. This oversight fails to acknowledge their ongoing significance and

the implications of development on their surroundings, leading to an incomplete analysis of cultural effects and disregarding their importance in the fabric of community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups involving local residents, yet the complete report has not been made available to the public. This omission creates a significant evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified through the developer's own investigations.

Residents have expressed measurable levels of stress, anxiety, and concern related to

the scale and proximity of the proposal, as evidenced by direct engagement rather than speculation. However, the failure to disclose the comprehensive assessment limits the opportunity for proper scrutiny of these findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor given the appropriate weight they warrant. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency directly 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 function may be jeopardised. The absence of the full dataset results in an application that fails to present a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and avert harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it cannot be proven that the application complies with this policy.

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

In conclusion, the non-disclosure of the complete Social Impact Assessment, combined with evidence of existing adverse impacts, renders the overall assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped landscape, and profound sense of remoteness. This development would introduce a continuous and dominant industrial presence that fundamentally alters the region's character, leading to a permanent and irreversible transformation of the landscape.

The assessment of visual impacts associated with this proposal is significantly lacking, failing to accurately represent the magnitude of change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular

coastal locations, severely affecting visual amenity and undermining the region's defining qualities of naturalness and remoteness. There is a clear failure to convey the extent of these impacts and their significance in relation to the sensitive nature of the landscape.

Methodological flaws further compromise the assessment, particularly in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not adequately capture the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns about the accuracy of the reported visual impact and questions the reliability of the overall assessment.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently addressed. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape interconnected with the Atlantic horizon. The assessment treats these heritage assets as isolated entities 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, altering the context in which heritage assets are experienced and diminishing their relationship with the natural horizon. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been properly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly 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. The lack of a thorough worst-case assessment further erodes any claims of policy compliance.

Finally, 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. Consequently, the resulting changes are fundamental and permanent, not reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current application presents serious deficiencies in its assessment of construction and pollution risks, failing to provide the necessary detail for a comprehensive evaluation of environmental effects. Significant seabed preparation and installation work is proposed in a high-energy Atlantic environment, yet it lacks fully developed

Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on unspecified future measures is particularly alarming in light of the delicate receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are sensitive to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer sufficient details on how these risks will be prevented, controlled, or monitored.

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

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures before making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandatory that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be made. The application also does not demonstrate adherence to 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 render the assessment materially deficient. These issues impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a varied marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and uses will be safeguarded without substantial disruption.

A notable concern is the presumption that fishing activity can be displaced without repercussions. There is no evidence provided that indicates alternative fishing grounds are available, easily accessible, or capable of withstanding additional pressures. This absence of information is critical, as such displacement poses risks of overfishing in other areas and could result in broader economic consequences for the local fishing fleet. Without a detailed and evidence-based analysis, understanding the impacts on fisheries and local livelihoods remains elusive.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances across extensive areas, affecting species like dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimises the significance of these effects without adequate supporting evidence.

There exists a contradiction within the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are described as negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which prevents 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 render the assessment incomplete and unreliable. These shortcomings obstruct a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is significantly deficient and does not adequately address the range of impacts from what is essentially one cohesive endeavour. The offshore turbines and the onshore components are interconnected, yet they are assessed separately. This fragmented approach obscures the true extent of the environmental and socio-economic repercussions.

Included within the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These undertakings involve excavation in areas of deep peat, notably within Barvas Moor, a critical carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore effects, the application hampers the ability to appropriately assess cumulative impacts. The Environmental Impact Assessment process mandates that all project components be considered collectively. The distinct separation of offshore and onshore elements leads to a lack of understanding regarding the combined effects on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide proof that the necessary consents or processes have been initiated, bringing into question the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies. The dark skies not only contribute to the environmental quality of the area but also play a significant role in its cultural identity and tourism value.

A crucial oversight within the Environmental Impact Assessment is the complete lack of evaluation regarding the impact of this lighting on visual amenity, landscape character,

and the experiences of both residents and visitors. Given the growing importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly significant. Furthermore, the assessment fails to address potential impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions.

The application does not include any lighting impact assessment or phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the likelihood of increased mortality. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has been overlooked. The absence of site-specific night-time data creates a critical gap in the understanding of ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and obstructing a lawful determination of the application.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, the lack of consideration for night-time character undermines the broader assessment of landscape and seascape impacts.

Overall, the absence of any assessment concerning dark skies and nocturnal wildlife presents a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

TOURISM

The assessment of the potential impacts on tourism is severely lacking, overlooking crucial economic and social implications for a vital sector of the Isle of Lewis economy. The economy here relies heavily on tourism, which thrives on the area's wild coastline, almost untouched landscapes, dark skies, and overall sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the application fails to provide a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviours, or the overall economic contributions of tourism.

Tourism has experienced substantial growth, escalating from £65 million in 2017 to more than £81.5 million, thereby supporting over 1,000 jobs and making up to 16% of the island's economy. Nonetheless, the application neglects to explore how the anticipated industrialisation of the seascape and subsequent decline in environmental quality could affect Tourism Gross Value Added and broader economic resilience. In

the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector.

Furthermore, the assessment inadequately addresses the significance of environmental quality in nurturing tourism, particularly highlighting how unspoiled landscapes and dark skies enhance visitor experiences and promote emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversification, the failure to properly evaluate tourism impacts raises broader concerns for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been duly assessed, as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, especially regarding economic impacts and the necessity of illustrating net benefits. It also contradicts strategic objectives that classify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to gauge the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This omission hampers a thorough evaluation of economic effects, supporting 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 echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application is put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for this application is incomplete and unreliable. Significant gaps in baseline data are evident, with the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of crucial impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment lacks completeness, hindering a full understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The failure to produce a

compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the omission of a full Social Impact Assessment represents a significant gap. Such deficiencies 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 is in direct violation of National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. It does not confirm that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the lack of tourism impact modelling. There has been insufficient assessment of the cumulative impact of both offshore and onshore components, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory provisions to demand the submission of the missing information.

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

Additional Comments

With my mother being from Lewis and Having spent every childhood holiday on the Island. I still visit 4 to 6 times a year. This proposal going ahead would be a disaster for the local environment, the residents and visitors alike. From environmental through health implication's I truly believe this would be devastating to the Island causing irreversible damage .

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: C4148910

Member of the public 1865

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

Dear Sir/Madam

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

A critical review of the Environmental Impact Assessment Report and supporting documentation reveals substantial deficiencies in planning, environmental, cultural, and procedural aspects. The application lacks an adequate evidential basis necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is limited and inconsistent, and essential elements of the proposal remain undefined. Furthermore, the application employs a flexible design framework which obscures the understanding of likely significant effects. There is an over-reliance on unspecified mitigation measures, precluding any assessment of their effectiveness. Consequently, the provided documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests necessary for consent and undermine the capacity of the competent authority to conclude that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal, which includes large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the

project's evolution. This narrative does not demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

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

The deficiencies are also evident in the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, with reliance instead on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal aligns with sustainable or policy-compliant solutions.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns due to a deficient assessment of marine ecology and protected species, particularly within the sensitive and biologically rich West Lewis coastal environment. The methodologies employed fail to present a comprehensive understanding of ecological receptors, resulting in incomplete baseline data that inadequately captures species presence, behaviour, and habitat use. This deficiency undermines the evidential basis required for evaluating potential impacts.

Among the critical shortcomings is the assessment of otters, a European Protected Species. The application does not fully recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behaviour means that the potential impacts of construction disturbances, noise, and increased activity have not been properly evaluated, thus compromising any

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

Additionally, the evaluation of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of these animals, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data results in an incomplete understanding of the baseline, diminishing the reliability of the conclusions reached.

These methodological inadequacies lead to the conclusion that claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, uncertainty prevails regarding the actual risks posed to marine species and habitats.

From a regulatory viewpoint, the application falls short of meeting the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This introduced uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be legally justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment regarding ornithological impacts associated with the proposed development is significantly flawed, demonstrating serious gaps in evidence and inconsistencies that compromise its conclusions. Notably, the development is situated in areas critical for foraging and along migratory paths used by seabirds, yet the application fails to adequately assess the potential effects of displacement, collision risk, and habitat loss on these species. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. The evidence provided does not meet the necessary standards to confirm that these species will not be negatively impacted.

Moreover, the assessment presents a fundamental contradiction; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is only applicable if significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions lack a solid evidentiary foundation. The implications of the feeding grounds for seabirds linked to protected sites, such as the

Lewis Peatlands and St Kilda, are inadequately addressed. The reliance on modelling introduces additional uncertainty, particularly concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies utilised appear to underestimate mortality risks, especially given that baseline data is incomplete and the behavioural responses of the species are not thoroughly understood.

Furthermore, the location of turbines within a recognised migratory corridor adds an additional layer of risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor are not sufficiently evaluated, nor are the potential impacts on species with relatively small global populations considered. From a regulatory standpoint, the application does not satisfy the evidential threshold required to assert that there will be no adverse effect on the integrity of the protected sites. The presence of conflicting conclusions, alongside notable data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which hinders a lawful conclusion that could support the granting of consent.

Ultimately, the deficiencies noted within the assessment point to a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable, marked by internal contradictions, methodological weaknesses, and inadequate evidence. Such shortcomings obstruct a comprehensive evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is significantly deficient and overlooks the West Lewis coastline's status as a dynamic cultural landscape, where the environment, language, tradition, and community are interconnected. The application employs a simplistic approach that treats heritage as discrete, unchanging assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice; however, the assessment categorises them merely as static elements, failing to acknowledge their continued use and significance, as well as the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application does not account for intangible cultural heritage aspects, including the Gaelic language and local traditions, as well as the enduring relationship

between the community and its coastal environment. These components are essential to the region's identity yet are conspicuously absent from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains poorly understood.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. The lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural error is the omission of a compliant Island Communities Impact Assessment, which is a statutory obligation under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This gap alone renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct violation of National Planning Framework 4, particularly regarding the protection of historic assets and sites. The failure to take into account both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from policy mandates.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and statutory requirements results in a substantial evidential gap. The cultural ramifications of the development have not been adequately appraised, and the application fails to present a sufficient basis for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is fundamentally flawed due to a lack of transparency, which is essential for a legally sound assessment. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the comprehensive report has not been made available. This creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to grasp the full spectrum of social risks revealed through the developer's research.

Summaries that are accessible indicate that local residents are already undergoing significant levels of stress, anxiety, and concern attributable to the scale and proximity of the proposed development. These effects arise from direct interactions and are not conjectural. Nonetheless, the absence of the complete assessment prevents thorough examination of these findings, limiting the opportunity to appraise their implications within the broader decision-making framework.

Moreover, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with the potential for "cultural loss" highlighted in the findings of the developer. Despite this recognition, these social impacts have not been fully acknowledged in the main application nor afforded the necessary weight. Consequently, withholding the complete Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is crucial for developments of this magnitude, especially when they may influence community character and functionality. The failure to provide the complete dataset results in an incomplete evidential foundation for evaluating the balance between benefits and potential harms.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is necessary for development to foster positive health outcomes while mitigating adverse effects; however, the evidence available suggests that there are already negative impacts that have not been fully disclosed. Without access to the entire assessment, it cannot be confirmed that the application aligns with this policy.

The implications of these procedural deficiencies are significant. The competent authority is unable to conduct a thorough socio-economic and health assessment without the full Social Impact Assessment, marking a material omission in the application and a failure to satisfy the evidential requirements established by the Environmental Impact Assessment framework.

Ultimately, the failure to disclose the complete Social Impact Assessment, coupled with documented existing adverse effects, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination, reinforcing the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is insufficient and does not capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The close placement of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally changing this character and resulting in an irreversible transformation of the landscape.

The application fails to accurately depict the magnitude of visual change that would occur. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this

impact within the context of such a delicate landscape.

Concerns also arise regarding 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 important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Moreover, there is a lack of evaluation of the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which leads to an incomplete understanding of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the preservation of natural places and historic assets. The scale of change contradicts 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 policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, not something that can be diminished 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 shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation activities. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in an assessment that is materially deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of fisheries and marine life, failing to provide a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these crucial habitats and uses, which raises serious concerns regarding potential disruptions.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. There is a lack of evidence within the application regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate

this displacement. This crucial omission poses risks of overfishing in other areas, which may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and livelihoods.

Moreover, the proposal poses considerable risks to marine species, notably through the underwater noise associated with construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that may affect marine life over large distances, particularly species such as dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population raises pressing concerns. Nevertheless, the application appears to minimise the significance of these impacts without providing sufficient supporting evidence.

There exists a contradiction within the application itself, where the necessity of licences to permit harm to European Protected Species is acknowledged, yet impacts are concurrently characterised as negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm is of a nature that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these cumulative effects obscures the overall impact on marine ecosystems and socio-economic conditions, hindering a proper understanding of the implications involved.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby undermining any assertion that it constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally inadequate, failing to consider the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and the onshore works are interconnected; however, they are assessed in isolation, leading to a fragmented analysis that masks the actual extent of environmental and socio-economic consequences.

Onshore elements encompass cabling that traverses protected moorland, the

construction of a substation in proximity to Stornoway, and the necessary access infrastructure that runs through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough assessment of these impacts, which obstructs a comprehensive understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to allow for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be assessed collectively; the division between offshore and onshore aspects results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, both of which are subject to policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance strategies have been enacted. This absence highlights a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland can lead to the release of stored carbon, potentially generating a carbon debt that undermines the objectives of renewable energy initiatives. The application fails to adequately address this matter or to show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application provides no evidence that the requisite consents or processes have been started, which brings into question the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to demonstrate protection of peatlands, habitats, and land use interests contravene the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of substantiation regarding environmental and land use impacts render this aspect of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a significant evidential gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental

quality, cultural identity, and tourism, particularly emerging sectors like astro-tourism. The proposed introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly alarming given the crucial role dark skies play in the area's identity. The absence of these assessments indicates a substantial gap in the landscape and environmental evaluation.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased risks of collision. The lack of a lighting impact assessment or phototaxis study means that there has been no evaluation of how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and the associated risks. Other species like Kittiwakes, which may forage or migrate at night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data leads to a critical lack of understanding concerning ecological impacts.

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

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

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

TOURISM

The application presents significant deficiencies in the assessment of tourism impacts, notably neglecting to analyse the economic and social consequences for a crucial 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 it is acknowledged

that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Since 2017, tourism has experienced substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this positive trend, the application fails to model the potential effects of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such analysis is vital to determine whether the proposed development would result in a net economic benefit or jeopardise a thriving sector.

Moreover, the assessment overlooks the critical role of environmental quality in sustaining tourism, particularly how unspoiled landscapes and dark skies enhance visitor experiences and contribute to burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a notable void in understanding the potential impacts on this recognised and expanding segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the immediate economic factors, affecting employment, local businesses, and community sustainability within a region that has limited economic diversification. Additionally, the absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, which is a requirement under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to gauge the economic ramifications of the proposal effectively.

In summary, the failure to quantify tourism impacts, to assess the environmental factors influencing visitor behaviour, and to acknowledge the island's economic dependency leads to a significant evidential gap. This gap undermines any robust evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its adherence to the principles of sustainable development as measured against statutory requirements, national policy, and evidential standards. It echoes the critical issues associated with the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. This current application, despite being presented under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a

complete and reliable evidential basis for decision-making.

There are notable deficiencies in the baseline data provided, including the use of an undefined design envelope and the reliance on unspecified mitigation measures. Key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked, rendering the Environmental Impact Assessment incomplete. This lack of thorough analysis inhibits a comprehensive understanding of the likely significant effects and residual impacts.

In addition to the evidential gaps, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the 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 unfit for determination.

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

Environmental risks associated with the proposal remain ambiguous and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion that impacts can be considered acceptable.

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

In conclusion, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. Therefore, it is essential that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory provisions to mandate the submission of the missing information. A formal request is thus made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

The structures would steal from me the solace of the views out to sea. The sky will be filled with their blades. The Upper Barvas land is to be given up to a huge factory, and the dark of the night gone with hundreds of red lights. I will not leave my home in Barvas, but this development will make my home and my area less attractive to live in, helping depopulation.

The project should not go ahead; it is based on a lie that the residents want it.

The processing of the electricity should be done offshore, like it is in Moray East. There is no sign at the landing sites beside Whitehills and Sandend that there are huge cables coming ashore. Why should residents here be treated differently?

The Upper Barvas factory, if the monstrosity should be built, needs to have no external lights switched on in the nights.

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: 071F945F

Member of the public 1866

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

Dear Sir/Madam

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

The application lacks an adequate evidential basis for a lawful determination. There is a noticeable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined. The employment of a flexible design framework hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims made regarding negligible or non-significant effects are not substantiated by robust evidence.

The proposal also presents clear and substantive conflicts with existing policy frameworks. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity are being met. These policy conflicts are directly relevant to the statutory tests required for consent and significantly undermine the ability of the competent authority to determine that the development is policy-compliant.

The scale of the proposed wind farm is unprecedented for this location, with large turbines proposed to be installed in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential weaknesses, and evident non-compliance with policy indicate that the application is incomplete and fails to support a lawful determination. Given these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed application fails to adequately assess alternatives in accordance with the Environmental Impact Assessment requirements. It does not offer a structured comparison of realistic alternatives based on their environmental effects. Instead, it

provides a narrative of project development that does not show that less harmful options have been properly identified or considered in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, scales of development, or design configurations. Specifically, the application does not indicate that the developer has seriously evaluated the possibility of placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that this lack of analysis precludes any conclusion that the proposed site is the least damaging option.

The shortcomings also apply to cable routing and landfall assessments, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, such as Barvas Cemetery, which holds cultural and spiritual significance. The absence of a clear avoidance strategy, alongside the lack of comparative analysis, suggests that mitigation by design has not been adequately considered, with an overreliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to assess whether less harmful and more suitable alternatives are available. A thorough alternatives assessment is essential; without it, the sustainability and policy compliance of the proposal cannot be confirmed.

From a policy standpoint, this inadequacy compromises alignment with National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community well-being. The absence of a systematic and comparative assessment represents a significant omission that supports the conclusion that the application has not been sufficiently evaluated and is unable to warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant oversight pertains to otters, which are classified as a European Protected Species. The application fails to adequately recognise and assess their active use of coastal areas for foraging and movement. Without considering their core foraging range

and behavioural patterns, the assessment neglects to evaluate the potential impacts of construction disturbance, noise, and increased activity. This gap undermines any claims of negligible effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a troubling inconsistency, asserting that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence. Moreover, the assessment inadequately addresses the consequences for seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. It fails to sufficiently consider the significance of these feeding grounds, particularly given that the reliance on modelling approaches introduces uncertainty, especially for species in decline, including Kittiwakes and Fulmars.

The ornithological assessment is fundamentally flawed, containing significant evidence gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not convincingly

demonstrate that these species will not be adversely impacted. Critical foraging areas and migratory pathways are situated near the development, yet the assessment falls short in evaluating the implications of displacement, collision risks, or habitat loss.

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

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

The identified deficiencies also indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected puts the proposal in direct conflict with national policy. Ultimately, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and lack of adequate evidence. These failures obstruct a thorough evaluation of the impacts and support the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage surrounding the West Lewis coastline is profoundly lacking. This area is a living cultural landscape, where the connections between environment, tradition, language, and community are deeply intertwined. The application reduces heritage to mere static assets, neglecting their dynamic social, cultural, and spiritual roles within the community.

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

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

development remains obscured.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal in question raises substantial concerns regarding its social impacts, health, and wellbeing. The developer has undertaken a Social Impact Assessment, which included engaging with local residents through focus groups. However, the full report remains unpublished, creating a critical evidential gap that hinders the public and relevant authorities from grasping the complete range of social risks highlighted by the developer’s own research.

Residents have reported experiencing significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct interactions and are therefore not based on speculation. Nevertheless, the lack of transparency in disclosing the comprehensive assessment restricts thorough examination of these findings, limiting the ability to assess their relevance in the decision-making process.

Furthermore, the proposal appears to pose a direct threat to the community’s identity and cohesion, with “cultural loss” noted in the developer’s findings. Unfortunately, these social impacts have not been adequately incorporated into the main application or afforded the necessary consideration. The failure to publish the full Social Impact Assessment thus obscures the true human and social costs linked to the development.

This deficiency in transparency compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health impacts is crucial, especially when community character and functioning are at stake. By not providing the complete dataset, the application lacks a comprehensive evidential foundation needed to weigh the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development projects should promote positive health outcomes and mitigate harm; however, existing evidence indicates adverse effects 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 is unable to conduct a rigorous socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential standards set forth in the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient information to proceed.

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 application presents significant shortcomings that raise urgent concerns regarding environmental protection. There is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This lack of detail hampers the evaluation of likely environmental effects, as the proposal involves extensive seabed preparation and installation works within the challenging conditions of a high-energy Atlantic environment. By relying on undefined future mitigation and contingency measures, the application leaves critical questions about their adequacy and effectiveness unanswered.

Particularly alarming is the potential impact on the West Lewis coastline, which is home to clean coastal waters and vital habitats. These areas are highly sensitive to disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and possible chemical or oil spills, it fails to adequately outline how these threats will be managed or mitigated. The

uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation adds to the urgency of these concerns, as it is impossible to ascertain the ecological effects without comprehensive modelling and management strategies.

Moreover, the lack of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether suitable safeguards are established to handle potential pollution events. This procedural gap introduces significant risks, making it difficult for the competent authority to assess environmental protection measures at the crucial stage of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to consent; without this information, a lawful determination cannot be achieved. Additionally, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding possible impacts render the assessment fundamentally deficient. These issues collectively hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises serious concerns regarding its impact on fisheries and marine life, particularly as it pertains to the waters off the West Lewis coast, which sustain a diverse marine ecosystem and an active fishing industry. The application does not adequately demonstrate that the ecological and socio-economic needs of these areas will be protected or maintained without significant disruption.

A major issue lies in the assumption made by the application that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This absence of information is critical, as it raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on both fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to the underwater noise generated during construction. High-energy hammer piling over an extended period is expected to create disturbances that could affect a wide range of species, including dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population should be of serious concern, yet the application

downplays the severity of these effects and lacks sufficient supporting evidence.

Moreover, there is an apparent inconsistency within the application, which acknowledges the requirement for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

The assessment further neglects to consider cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise pollution, 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 the socio-economic conditions surrounding them.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally incomplete, failing to recognise the full extent of impacts associated with what constitutes a single integrated project. The connection between the offshore turbines and onshore works is inherent, yet they are analysed separately, leading to a disjointed evaluation that conceals the real scale of environmental and socio-economic consequences.

Key onshore elements involve cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the associated infrastructure necessary for access through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically valuable habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the division of offshore and onshore elements obscures the comprehensive impacts on peatlands, habitats, and local communities.

There exist significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented, resulting in a marked evidential gap concerning biodiversity protection.

Concerns are also raised regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application fails to adequately tackle this concern or illustrate that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have commenced, thus casting doubt on deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any lighting impact assessment or

phototaxis study, neglecting to evaluate how aviation lighting may affect these species or lead to increased mortality.

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

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

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

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

TOURISM

The assessment of tourism impacts related to the development proposal is inadequate and does not evaluate the economic and social effects on a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which relies heavily on these natural features. The application acknowledges that 86% of visitors are attracted by the scenery, but it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island’s economy. However, the application does not model how the industrialisation of the seascape and potential decline in environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the region. This lack of analysis makes it impossible to assess whether the development would yield a net economic benefit or harm a sector that is both established and expanding.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as the rising interest in nature-based tourism and astro-

tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a crucial gap in understanding the potential impacts on a recognised and developing segment of the local economy.

For an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, particularly concerning economic impacts and the need to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic dependence create a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the primary issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was 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 complete or reliable evidential basis for determination.

There are significant gaps in baseline data, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of critical impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, further undermine the application. As such, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a material omission, hindering the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts with National Planning Framework 4, failing to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate acceptable health and wellbeing impacts or provide evidence of 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 evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

Moreover, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and 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 considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory provisions to mandate the submission of the missing information.

A formal request is therefore made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Our island as we've known it will perish because of this. Marine life, light pollution, noise pollution, our precious views and ways of life gone. It is a harrowing thought for locals that this might go ahead. A devastation. No consideration whatsoever given to the people of Lewis. Absolutely heartbreaking thought.

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: 67BB753A

Member of the public 1867

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 processes. The objection is informed by 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, relatively untouched environment, and rich cultural identity. Concerns arise about the scale, proximity, and design of the project in relation to statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key elements of the proposal. The adoption of a flexible design framework obscures understanding of potential significant effects, and the proposed mitigation measures are unspecified, making their effectiveness impossible to evaluate. Consequently, the documentation does not allow for a thorough or informed assessment of environmental, cultural, or community effects, and claims of negligible or non-significant impacts lack strong evidence.

There are substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and public health and wellbeing. It fails to prove that it meets national standards for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests for consent and weaken the ability of the competent authority to determine the proposal's policy acceptability.

The unprecedented scale of the project in this area, with large turbines located close to the shore, raises serious concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unsuitable for a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures, monitoring strategies, and management plans that have not yet been articulated. This approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

Additionally, there are considerable gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when claims of negligible or non-significant effects are not backed by robust data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty incompatible with statutory obligations.

Moreover, this application does not meet the evidential threshold stipulated under the Habitats Regulations, as it fails to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, as it does not demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

The reliance on a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, fosters significant uncertainty that hinders a consistent application of a worst-case scenario. Such a lack of commitment undermines the integrity of the assessment, meaning that the impacts presented may not truly represent the development ultimately constructed. Consequently, the competent authority and the public are left without a clear understanding of the actual environmental effects, which further complicates the decision-making process.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not convincingly demonstrated that the possibility of

placing turbines further offshore has been seriously considered, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, highlights the significance of the missing analysis, which prevents any conclusion regarding whether the proposed siting is indeed the least damaging option.

These deficiencies extend to the evaluation of cable routing and landfall, where insufficient evidence is presented to show that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis suggests that mitigation by design has not been effectively applied, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a significant failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a rigorous assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, leading 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 is fundamentally flawed, failing to provide a comprehensive and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region is known for its sensitivity and biological activity, yet the existing baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat usage of local species. Consequently, the assessment lacks a credible evidential basis for evaluating potential impacts.

A significant oversight in this assessment concerns otters, which are recognised as a European Protected Species. The application does not adequately identify or evaluate their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts of construction disturbances, noise, and increased human activity. As a result, the conclusions drawn regarding the absence of significant effects on this species are compromised.

Further issues are evident in the assessment of basking sharks, where the reliance on

aerial surveys introduces a notable detection bias, particularly in the challenging conditions of the Atlantic. This methodology is prone to underestimating their presence, especially in light of established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or give due consideration to this vital data results in a flawed baseline, undermining the reliability of the conclusions reached.

The aforementioned methodological deficiencies lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This gap in understanding introduces uncertainty regarding the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to fulfil the criteria set out in the Environmental Impact Assessment framework and the National Planning Framework 4, as it does not properly identify or assess protected species. The level of uncertainty generated by these omissions precludes the ability to dismiss adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, it is clear that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application raises significant concerns regarding its reliability and thoroughness, primarily due to internal inconsistencies and substantial evidence gaps. It is critical to note that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. The application fails to sufficiently demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. Key foraging areas and migratory pathways, which are crucial for these birds, are affected by the proposed development. However, the assessment does not adequately address the implications of potential displacement, collision risks, or habitat loss.

A notable contradiction is evident 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 typically needed when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and indicates that its conclusions are not underpinned by solid evidence. The assessment lacks adequate evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is insufficiently acknowledged, and the use of modelling approaches introduces further

uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the context of incomplete baseline data and incomplete understanding of species' behavioural responses.

The positioning of turbines within an acknowledged migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight route for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, 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, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies identified signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In conclusion, the overall assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These deficiencies hinder a thorough evaluation of the potential impacts, leading to the overarching 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 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 proposal poses a significant threat to community identity and cohesion, as highlighted by the findings of the developer's own research, which identified "cultural loss." However, these impacts have not been adequately incorporated into the main application or afforded the necessary consideration. The absence of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

Furthermore, the assessment of social impacts, health, and wellbeing is materially deficient, lacking the transparency required for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report has not been made public. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full extent of social risks identified through the developer's own work.

Available summaries reveal that residents are currently facing measurable stress,

anxiety, and concern related to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are not speculative in nature. However, the failure to disclose the full assessment obstructs proper scrutiny of these findings and restricts the ability to evaluate their significance within the decision-making process.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and avoid harm. Yet, the evidence available suggests existing adverse effects that have not been fully revealed. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

Moreover, the lack of transparency undermines the Environmental Impact Assessment process. It is crucial to have a comprehensive understanding of social, economic, and health impacts for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset results in an application that does not present a complete evidential basis for assessing the balance between benefits and harm.

The procedural implications of these deficiencies are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This situation represents a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the withholding of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the conclusion that the application is not supported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. An assessment of seascape, landscape, and visual impacts associated with the proposed large-scale turbines reveals significant deficiencies, failing to adequately convey the scale of change or the sensitivity of the environment. The close proximity of these turbines to the shoreline would result in a continuous and dominant industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The proposed application does not properly represent the magnitude of visual change that would occur. Views from residential areas, historic sites, and popular coastal locations would be dominated by the turbines, directly impacting visual amenity and eroding the intrinsic qualities of naturalness and remoteness. Moreover, the assessment does not effectively communicate this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not encompass the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and valued landscapes. This shortfall risks an understatement of the visual impact, thereby undermining the reliability of the assessment.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been adequately addressed. The Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, which emphasises the protection of natural places and historic assets. The extent of change proposed is inconsistent with the obligation to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment further undermines claims of compliance with policy guidelines.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is fundamentally lacking and fails to provide the necessary detail for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that would be developed after consent, which limits any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies for these risks.

Further uncertainty surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This situation introduces procedural risks and diminishes the ability of the competent authority to assess the effectiveness of environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation measures must occur prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing 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 a thriving fishing industry. Unfortunately, the application does not adequately demonstrate how these essential uses and habitats will be safeguarded against significant disruption. The assessment of fisheries and marine life is lacking, failing to provide a thorough evaluation of the ecological or socio-economic impacts.

One major concern is the assumption that fishing activities can be displaced without any repercussions. The application does not present evidence that there are alternative fishing grounds that are accessible or capable of bearing the additional pressure. This critical omission raises serious questions, as such displacement could lead to

overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based examination, the potential impacts on fisheries and local livelihoods remain obscured.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is likely to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application downplays the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously classifying impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to occur at levels that warrant legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed, as it fails to evaluate onshore infrastructure in conjunction with offshore elements, resulting in a fragmented analysis that conceals the true magnitude of environmental and socio-economic repercussions. The offshore turbines are interconnected with onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and access routes across sensitive landscapes. These onshore activities involve excavation in areas of deep peat, notably within Barvas Moor, an essential carbon store and ecologically significant habitat. The absence of a thorough examination of these impacts hinders a complete understanding of the project's environmental footprint.

The lack of a unified assessment of both onshore and offshore impacts leads to an inadequate evaluation of cumulative effects, violating the Environmental Impact Assessment process, which mandates consideration of all project components as a whole. Consequently, the combined impacts on peatlands, habitats, and local communities remain insufficiently understood. Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The proposal does not adequately demonstrate that the potential impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application fails to address this critical issue or prove that the overall carbon balance is favourable. Moreover, routing infrastructure through active croft land raises potential conflicts with established land use and legal rights, with the application lacking evidence that necessary consents or processes have been initiated, raising serious questions about its feasibility and compliance with legal requirements.

From a policy standpoint, the application's failure to assess the project comprehensively and to ensure the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that the impacts can be avoided or mitigated further weakens the application. Collectively, the disjointed nature of the 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 both incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment and negatively impact the visual amenity, landscape character, and experiences of residents and visitors. The failure to evaluate these lighting impacts is particularly concerning, especially in relation to the importance of dark skies to the region’s identity and the emerging tourism sector of astro-tourism.

Additionally, the application does not assess the potential impacts on nocturnal wildlife, despite species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel being sensitive to artificial lighting due to phototaxis. This sensitivity can lead to disorientation and increased collision risk, yet the proposal lacks any lighting impact assessment or phototaxis study. Without such evaluations, the application fails

to consider how the proposed aviation lighting may affect these species and contribute to increased mortality rates. Furthermore, the reliance on daytime survey data in the ornithological assessment overlooks nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, and this risk remains unassessed.

The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts. Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination. From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the landscape.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

TOURISM

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

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

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

From a policy perspective, the application does not demonstrate compliance with the

National Planning Framework 4, particularly concerning economic impact and the requirement to show net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This deficiency prevents a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

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

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

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

There is direct conflict with National Planning Framework 4. The proposal does not demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to show acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

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

impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E5A3AF96

Member of the public 1868

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a complete, transparent, or trustworthy overview of the likely environmental repercussions of the proposal. The flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the application of a worst-case scenario. This compromises the assessment's integrity, meaning the impacts outlined may not accurately represent the development that is ultimately built. Consequently, both the public and the competent authority are deprived of a true understanding of the extent of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be mitigated later obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which necessitates that likely significant effects and mitigation measures be established before determination.

There are substantial evidential deficiencies present, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are reached without strong supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal additionally falls short of demonstrating compliance with National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it cannot be verified that impacts have been comprehensively assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species fails to deliver a comprehensive and dependable understanding of the ecological receptors present within the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the data collected is insufficient. The methods employed do not adequately capture the presence, behaviour, and habitat use of various species.

Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight in this application is the treatment of otters, which are classified as a European Protected Species. The failure to fully acknowledge and evaluate their active use of coastal areas for foraging and movement is concerning. Without a proper assessment of their core foraging range and behavioural patterns, the potential impacts from construction disturbances, noise, and heightened activity have not been thoroughly examined. This inadequacy undermines any conclusions drawn regarding the absence of significant effects on otters.

Furthermore, there are notable shortcomings in the assessment of basking sharks, where dependence on aerial surveys leads to considerable detection bias, particularly in Atlantic conditions. This method is likely to underreport the presence of these sharks, especially when compared to established land-based observations that show frequent use of these waters. The omission or inadequate consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions provided.

These methodological shortcomings mean that the assertions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation creates uncertainty 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 and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty that arises from this situation prevents the dismissal of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the entire evaluation process. The developer has conducted a Social Impact Assessment, which included focus groups with local residents, but the comprehensive report remains unpublished. This significant gap in evidence restricts both public understanding and the ability of the competent authority to grasp the complete range of social risks identified in the developer's own research.

Residents are reportedly experiencing considerable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not mere speculation. However, the absence of the full assessment limits the opportunity for thorough examination of these findings, which is essential for informed decision-making.

Moreover, there is growing sentiment that the proposal threatens community identity and cohesion, with findings highlighting "cultural loss." Despite the significance of these impacts, they have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This situation has serious implications for the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial, especially for developments of this magnitude that may affect community character. The failure to provide complete data means the application lacks a comprehensive evidential basis for weighing benefits against potential harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy is unproven.

The procedural ramifications are significant as well. The competent authority cannot conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a major omission within the application and fails to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside the documented existing adverse impacts, results in an incomplete and unreliable evaluation. This deficiency hampers a lawful determination and reinforces the assertion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly inadequate, failing to accurately portray the degree of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The addition of large-scale turbines in close proximity to the shore would create a persistent industrial presence, fundamentally changing this character and leading to an irreversible transformation of the landscape.

Moreover, the application does not sufficiently depict the extent of this visual change. The scale and proximity of the turbines would dominate views from residential areas,

historic sites, and frequently visited coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of this impact within the context of such a sensitive landscape.

Concerns are also present regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact is understated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets without acknowledging their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not just a visual impact, but also a wider cultural and spatial damage that has not been properly evaluated within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate, lacking the detail necessary to evaluate potential environmental effects. The proposal entails considerable seabed preparation and installation works in a high-energy Atlantic environment. However, the application does not include fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful evaluation of their effectiveness or sufficiency.

This reliance on unspecified future measures is especially troubling given the sensitivity of the environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate information on how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are in place to address pollution incidents. This introduces procedural risk and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to granting consent, and if this information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries in the application is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The West Lewis coast is home to a vibrant marine ecosystem and an active fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and industries can be safeguarded from significant disruption.

A critical concern is the assumption that fishing activities can simply be relocated without negative consequences. The application lacks evidence supporting the availability, accessibility, and capacity of alternative fishing grounds to absorb any

increased pressure. This absence of information is notable, as displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet. Without a solid and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, impacting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

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

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

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

TOURISM

The application proposes large-scale offshore infrastructure, yet it lacks a thorough assessment of the tourism impacts, which are crucial for the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, nearly unspoiled landscapes, dark skies, and the feeling of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable evaluation of how this infrastructure would affect visitor numbers, behaviours, or the overall economic contribution of tourism.

Since 2017, tourism has seen remarkable growth, rising from £65 million to over £81.5

million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and degradation of environmental quality could impact Tourism Gross Value Added or the wider economic resilience of the area. Without this crucial analysis, it remains impossible to ascertain whether the development would offer a net economic benefit or potentially jeopardise an important and expanding sector.

Moreover, the application neglects to consider the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies for the visitor experience. This oversight extends to emerging markets such as nature-based tourism and astro-tourism, compounded by the absence of a Dark Skies Assessment that would clarify impacts on a significant part of the local economy. In a community with limited economic diversity, this failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that economic vulnerabilities have not been adequately assessed, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with National Planning Framework 4 regarding economic impact and the necessity of showing a net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and does not provide the evidence necessary for the competent authority to evaluate the economic ramifications of the proposal. Collectively, these shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency result in a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its failure to meet the requirements of sustainable development, which is evident when assessed against statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This new application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a reliable evidential basis for determination.

Critical gaps in baseline data are evident throughout the application. It relies on an undefined design envelope, incorporates unspecified mitigation measures, and omits key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are procedural failings that further undermine the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a significant omission. These deficiencies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, or cultural heritage. The application fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and could be significantly detrimental. 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 achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal will 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 negative impacts on tourism will create permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The vast information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision-making process. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information. A formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

This will ruin the beautiful views of our island and be a negative impact on wildlife. This will not benefit the island and will have a negative impact on the tourism. A key feature on our island is our beautiful beaches and views.

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: 3431296D

Member of the public 1869

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the

proposal. The flexible Project Design Envelope used lacks commitment to specific turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data all contribute to rendering the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives significantly undermines the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application provides a narrative of project evolution that fails to demonstrate that less harmful options have been properly identified and assessed in favour of more damaging solutions.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. The application does not establish that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Considering the sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, the lack of such an analysis hampers any conclusion that the proposed siting represents the least damaging option.

Deficiencies are also apparent in the cable routing and landfall assessment. There is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns due to a deficient assessment of marine ecology and protected species, particularly within the sensitive and biologically rich West Lewis coastal environment. The methodologies employed fail to present a comprehensive understanding of ecological receptors, resulting in incomplete baseline data that inadequately captures species presence, behaviour, and habitat use. This deficiency undermines the evidential basis required for evaluating potential impacts.

Among the critical shortcomings is the assessment of otters, a European Protected Species. The application does not fully recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behaviour means that the potential impacts of construction disturbances, noise, and increased activity have not been properly evaluated, thus compromising any conclusions drawn about the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of these animals, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data results in an incomplete understanding of the baseline, diminishing the reliability of the conclusions reached.

These methodological inadequacies lead to the conclusion that claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, uncertainty prevails regarding the actual risks posed to marine species and habitats.

From a regulatory viewpoint, the application falls short of meeting the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This introduced uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be legally justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment's internal inconsistencies and methodological weaknesses render it highly unreliable. It lacks sufficient evidence to conclude that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will remain unaffected. The reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species in severe decline, such as Kittiwakes and Fulmars. Moreover, the methodologies applied are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The development is sited within key foraging areas and migratory pathways. This placement creates a significant risk, as it establishes a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of potential sustained mortality in this corridor, nor does it adequately consider the effects on species with relatively small global populations.

A critical contradiction exists within the application itself. The developer states that

there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided.

From a regulatory standpoint, the application fails to meet the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data deficiencies, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been achieved. This failure engages the precautionary principle, obstructing a lawful conclusion in support of consent.

The application does not effectively demonstrate that the development will not adversely affect seabird populations already in decline. This inability places the proposal in direct conflict with national policy, specifically regarding biodiversity protection and the safeguarding of natural assets, as outlined in National Planning Framework 4.

Overall, the significant gaps in evidence and the lack of a robust evaluation of potential impacts lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interact deeply. The application reduces heritage to static, isolated assets instead of acknowledging their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites are active burial grounds and places of spiritual significance, yet the assessment labels them as mere static features, failing to account for their continued relevance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and ignores their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the community's long-standing bond with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity akin to that of Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process. The lack of genuine

engagement calls into question the credibility of the assessment and fails to align with established participation principles in decisions affecting cultural and environmental matters.

There is a crucial procedural oversight regarding the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This lack of assessment alone obstructs a lawful decision.

From a policy standpoint, these shortcomings directly contradict the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historical assets. The failure to account for both tangible and intangible heritage and to recognise ongoing cultural practices clearly deviates from established policy guidelines.

Overall, the neglect to evaluate living heritage, intangible cultural significance, community rights, and necessary statutory assessments results in a major evidential deficiency. The cultural effects of the development remain unexamined, and the application fails to provide an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The Social Impact Assessment commissioned by the developer has not been published in its entirety, leading to a significant evidential gap. This lack of transparency not only hampers the public's understanding but also restricts the competent authority's ability to grasp the full extent of social risks identified through the developer’s own research. Available summaries suggest that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation, yet the failure to disclose the complete assessment limits proper scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these adverse impacts have not been adequately incorporated into the main application or given the weight they deserve. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This situation undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is critical for developments of this nature, especially when community character and functionality may be at stake. The application falls short by not providing the full dataset needed for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, there is a clear failure to comply with National Planning

Framework 4 concerning health and wellbeing. Development projects must foster positive health outcomes and avoid causing harm. Nevertheless, the evidence available points to existing adverse effects that have not been fully disclosed, leaving compliance with this policy unproven.

The procedural implications are profound, as the competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of adverse effects already in place, renders the assessment incomplete and unreliable, which obstructs a lawful determination and affirms that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

spatial harm that the application does not adequately address.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is at odds with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be rendered acceptable through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks lacks the necessary detail to adequately evaluate potential environmental effects. There is significant seabed preparation and installation work proposed within a high-energy Atlantic environment, yet the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful assessment of their effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is especially troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these issues.

Further uncertainty surrounds the scale and behaviour of sediment plumes that would result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty also encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application prevents a thorough evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the ability

of the competent authority to properly assess the environmental protection measures before determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent, and without this information, a lawful determination cannot be reached. Moreover, the application does not adequately 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 regarding potential impacts contribute to a materially deficient assessment. These deficiencies hinder a robust evaluation of construction and pollution risks and further underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not take into account cumulative impacts from various pressures like habitat disturbance, noise, and fishing activity displacement. Without a thorough evaluation of these combined effects, it is impossible to assess the

overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not consider the full impacts of the project as a whole. The offshore turbines and onshore works are linked but are evaluated separately, which leads to a fragmented analysis that obscures the environmental and socio-economic effects.

Onshore works involve cabling across protected moorland, the construction of a substation near Stornoway, and access routes through sensitive landscapes. These activities include excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application lacks a comprehensive evaluation of these impacts, making it difficult to understand the overall environmental footprint of the project.

By excluding or postponing the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment requires that all project components are examined together, yet the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and communities are not fully acknowledged.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a gap in biodiversity protection.

The proposal also brings up concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that opposes the goals of renewable energy development. The application does not adequately address this matter or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises concerns about the feasibility and legality of implementation.

From a policy standpoint, the failure to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected 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.

Overall, the separation of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, making a lawful determination impossible.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting, which would be visible across long distances, threatens to create a continuous “wall of light” effect on the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate how this lighting will impact visual amenity, landscape character, and the experience for both residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. As such, the neglect to consider these impacts leads to a significant gap in the overall landscape and environmental assessment.

Moreover, there is no examination of the effects on nocturnal wildlife. Specific species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality rates.

This gap is further highlighted by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activities or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, also face vulnerability to disorientation from artificial light, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

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

From a policy standpoint, the lack of evaluation contravenes National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. This oversight also compromises the broader assessment of landscape and seascape impacts, as the character of the night-time environment is an integral component of the overall landscape.

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

TOURISM

The assessment of tourism impacts associated with the proposed development is fundamentally inadequate, particularly regarding its implications for a critical component of the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. The application acknowledges that a substantial 86% of visitors are attracted by the scenic beauty; however, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has seen considerable growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for approximately 16% of the island's economy. Despite this positive trend, the application neglects to model the potential impact of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Additionally, the assessment overlooks the vital role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in understanding the potential impacts on this recognised and growing segment of the local economy. In a context where the island community faces limited economic diversification, this failure to evaluate tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide the

necessary evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and considering the island's economic dependencies culminate in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it lacks a solid evidential foundation.

There are significant gaps in the baseline data presented, an undefined design envelope, unverified mitigation measures, and missing assessments of key impact areas such as nocturnal wildlife, onshore infrastructure, and tourism effects. The Environmental Impact Assessment is thus incomplete, failing to provide a thorough understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to submit a complete Social Impact Assessment is a serious omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential burden required to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would lead to substantial and irreversible changes to a sensitive

landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The extensive deficiencies in information, along with policy contradictions and unresolved environmental risks, preclude a lawful and evidence-based decision. It is essential for the competent authority to either reject the consent application on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary information.

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

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: 8CD916C3

Member of the public 1870

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, highlighting several deficiencies related to planning, environmental concerns, cultural aspects, and procedural matters. The development is set to take place off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is critical missing environmental data, while the baseline information provided is limited and inconsistent. Furthermore, important aspects of the proposal remain undefined. The flexible design framework used hinders a clear understanding of likely significant effects. Additionally, the application relies on mitigation measures that have not yet been specified, making it impossible to assess their effectiveness. Consequently, the documentation does not allow for a complete or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are significant policy conflicts apparent in the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests needed for consent and undermine the competent authority's ability to conclude that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented in the area, with large turbines positioned near the shoreline. This raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The lack of adequate information, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a thorough and reliable account of the environmental implications of the proposal. A

flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the application of a worst-case scenario, ultimately undermining the assessment's integrity. As a result, the impacts outlined may not truly represent the development as it will ultimately be constructed, leaving both the public and the competent authority without a clear understanding of the potential environmental consequences.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later is unacceptable, as it obstructs a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This approach is contrary to the core purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are significant gaps in evidence, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of comprehensive information leads to an unclear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold established under the Habitats Regulations, failing 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 National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is evident that impacts have not been fully assessed nor have appropriate safeguards been established.

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations.

Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the design has not been mitigated by proper planning, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings that compromise our understanding of the ecological receptors in the West Lewis coastal environment. This area is not only sensitive but also biologically active, yet the baseline data provided is insufficient. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, leading to a lack of sound evidential basis for evaluating potential impacts.

One critical oversight concerns otters, which are classified as a European Protected Species. The application fails to acknowledge their active foraging and movement along the coast, and neglects to assess their core foraging range and behavioural patterns. This oversight means the potential impacts of construction-related disturbances, including noise and increased activity, have not been thoroughly evaluated, undermining any assertions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when juxtaposed with reliable land-based observations that

indicate frequent utilisation of these waters. The neglect to include or appropriately assess such data contributes to an incomplete baseline and diminishes the reliability of the findings.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are founded on assumptions instead of robust evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, which raises concerns about the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or adequately assess the protected species involved. The uncertainty created by these deficiencies obstructs the possibility of excluding adverse effects beyond a reasonable scientific doubt, thereby necessitating the precautionary principle. In light of these issues, granting consent is not a lawful option.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, riddled with internal inconsistencies and significant gaps in evidence. It does not adequately demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse effects from the proposed development. This area is crucial for foraging and migratory pathways, yet the potential risks of displacement, collision, and habitat loss have not been sufficiently evaluated.

There is a notable contradiction in the application; while the developer asserts that there will be no significant adverse effects, they simultaneously present a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This raises serious doubts about the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided.

The assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding areas is not thoroughly considered, and the reliance on modelling approaches adds further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate potential mortality, especially in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses a significant risk, effectively creating a barrier for species travelling between the United Kingdom and Iceland. There is insufficient assessment of the long-term implications of sustained mortality within this corridor or the potential impacts on species with limited global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to confidently conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and undermines any lawful conclusion in favour of consent.

Moreover, these deficiencies reflect a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal directly in conflict with national policy.

Collectively, the assessment is deemed unreliable due to its internal contradictions, methodological flaws, and lack of sufficient evidence. These issues impede a thorough evaluation of impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it overlooks the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply interconnected. The application simplifies heritage into separate, unchanging assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice; however, the assessment designates them as static elements, failing to recognise their continued relevance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community has with the coastal environment. These aspects are vital to the identity of the area, yet they are completely omitted from the assessment, which is a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking

population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation concerning cultural and environmental interests.

A significant procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic sites and landscapes. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear deviation from policy mandates.

Overall, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application falls short of providing a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is a serious concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been released. This creates a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks identified through the developer’s research.

Available summaries show that residents are facing 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 not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, as "cultural loss" has been highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is

crucial for developments of this size, especially when community character and functioning are at stake. By withholding the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing negative effects that have not been fully reported. Without the full assessment, compliance with this policy remains unproven.

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

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately address the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline, characterised by an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes that would arise. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby impacting visual amenity and undermining the defining qualities of naturalness and remoteness. There is a concerning lack of clarity regarding the level of impact and its significance within the context of such a sensitive landscape.

Methodological issues also arise in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, there is a failure to adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape

setting, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact as well as broader cultural and spatial harm that has not been sufficiently addressed in the application.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resulting changes would thus be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment fails to represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation activities. In the absence of robust modelling and well-defined management strategies, it is impossible

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in an assessment that is materially deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy standpoint, the proposal does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any determination that the project constitutes sustainable development.

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises serious concerns regarding carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt that undermines the objectives of renewable energy development. There is insufficient information within the application to address this critical issue, nor does it demonstrate that the overall carbon balance remains beneficial.

Significant risks to sensitive habitats are also apparent, including machair systems and peatland environments that are afforded policy protection. The application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a clear evidential gap in relation to biodiversity protection.

The onshore elements consist of cabling across protected moorland, construction of a substation near Stornoway, and the associated access infrastructure traversing sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and ecologically sensitive habitat. The incomplete assessment of these impacts obstructs a full understanding of the project's overall environmental footprint.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, leading to questions regarding deliverability and lawful implementation.

The assessment of onshore infrastructure is materially incomplete and does not take into account the full extent of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically connected,

yet they are examined separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

By excluding or deferring the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are evaluated together; however, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

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

Collectively, the separation of project components, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts render this portion of the application incomplete and unreliable, precluding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is defined by its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposed development introduces permanent red aviation lighting that would be visible over great distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Crucially, the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The absence of an evaluation of nocturnal wildlife impacts is particularly alarming. 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 increased risks of collision. The lack of a lighting impact assessment or phototaxis study in the application means that the potential effects of aviation lighting on these species and their mortality rates remain unexamined.

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

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard necessary to exclude adverse impacts beyond reasonable scientific

doubt has not been met, which engages the precautionary principle and hinders a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive assessment of landscape and seascape impacts, given that night-time character is a fundamental aspect of the environment.

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

TOURISM

The assessment concerning the impacts on tourism is inadequate and does not fully consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantitative evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to 16% of the island’s economy. However, the application fails to model the potential impacts that the industrialisation of the seascape and a decline in environmental quality may have on Tourism Gross Value Added and the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or potentially harm an established and expanding sector.

Moreover, the assessment neglects to address the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly regarding economic

impact and the need to show net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, and it fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the combined shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This limits the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is lacking in completeness.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to adhere to the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis provided for this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns. The application relies on unspecified mitigation measures and fails to account for significant impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment is a notable 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.

The proposal stands in direct opposition to National Planning Framework 4. It fails to provide assurances for the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements remain improperly assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary

principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I formally object to the above application as a resident on the west coast of the Isle of Lewis who will be significantly effected by this proposal both during the construction of it and during its working life time.

The idea of this development happening has caused severe stress and worry about the future if this development goes ahead, we bought our forever home on the west coast because of the rural location, quiet surrounds and beautiful view out to the sea... if this development goes ahead we will be faced with years of pre and post construction disruption from noise, visual impacts and travel disruptions moving in and around the island. There is a massive worry not just for myself but for everyone living here what effects the development will have on our health and well-being, I personally suffer from a life long neurological illness which is massively effected by stress and there is the concern that the noise and vibration impacts of this proposed development will also detrimentally effect my health.

To understand what positives and negatives are associated with wind turbines as a sustainable means of generating power I enrolled in a university course on wind energy systems, during this course I was horrified to learn how completely inefficient wind turbines are for power generation. You'd expect them to perform as close as possible to 100% however in practice the capacity factors of them is only 25%-35% this means 65%-75% of the time wind turbines are not producing any power! This left me in utter disbelief that the Isle of Lewis and Scotland as a whole is being plastered with these monstrosities both on shore and off shore in unindustrialised areas to only produce power 25%-35%, basically the turbines would only generate power for 3 months every year.
The size of the turbines being proposed are completely out of proportion with the island and distance from land, these are going to be the biggest turbines in the world only 6km from land. Located within the area they are being proposed the sea bed is going to

experience unfathomable and irreversible damage to both sea fauna and flora. The sizes and quantity of turbines is additionally going to have catastrophic impacts on bird populations as the proposal is right in the middle of migratory routes for multiple species and the hunting and feeding area of many local bird species.

There also huge uncertainty of the inland works for this development as this is forming a separate planning application which I think is a sneaky approach as it does not illustrate the full picture of the development and the impacts it will have on the land , specifically the scale of the onshore landing point were the cables connect to the associated substation buildings which will be huge buildings grossly out of scale with the surrounding domestic properties most of which are bungalows. There is also the releasing of thousands of cubic meters of c02 when the peatland is dug up between the west coast all the way to the east coast of the island to run cables to the main substation at Arnish where all the power will be moved off the island!

How can we justify destroying the natural unspoilt environment for this, there are surely more appropriate forms of green energy production or more appropriate locations for this size of wind farm to be located away from an area of such cultural significance

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: 2D0DD29E

Member of the public 1871

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the

proposal. The flexible Project Design Envelope used lacks commitment to specific turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data all contribute to rendering the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The inadequacy in the assessment of alternatives significantly undermines the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured and reasoned comparison of viable alternatives based on environmental effects, the application provides a narrative of project evolution that fails to demonstrate that less harmful options have been properly identified and assessed in favour of more damaging solutions.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. The application does not establish that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. Considering the sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, the lack of such an analysis hampers any conclusion that the proposed siting represents the least damaging option.

Deficiencies are also apparent in the cable routing and landfall assessment. There is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy, combined with the absence of comparative analysis, indicates that mitigation by design has not been applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns due to a deficient assessment of marine ecology and protected species, particularly within the sensitive and biologically rich West Lewis coastal environment. The methodologies employed fail to present a comprehensive understanding of ecological receptors, resulting in incomplete baseline data that inadequately captures species presence, behaviour, and habitat use. This deficiency undermines the evidential basis required for evaluating potential impacts.

Among the critical shortcomings is the assessment of otters, a European Protected Species. The application does not fully recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behaviour means that the potential impacts of construction disturbances, noise, and increased activity have not been properly evaluated, thus compromising any conclusions drawn about the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of these animals, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data results in an incomplete understanding of the baseline, diminishing the reliability of the conclusions reached.

These methodological inadequacies lead to the conclusion that claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, uncertainty prevails regarding the actual risks posed to marine species and habitats.

From a regulatory viewpoint, the application falls short of meeting the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This introduced uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be legally justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment's internal inconsistencies and methodological weaknesses render it highly unreliable. It lacks sufficient evidence to conclude that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will remain unaffected. The reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species in severe decline, such as Kittiwakes and Fulmars. Moreover, the methodologies applied are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The development is sited within key foraging areas and migratory pathways. This placement creates a significant risk, as it establishes a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of potential sustained mortality in this corridor, nor does it adequately consider the effects on species with relatively small global populations.

A critical contradiction exists within the application itself. The developer states that

there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the evidence provided.

From a regulatory standpoint, the application fails to meet the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data deficiencies, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been achieved. This failure engages the precautionary principle, obstructing a lawful conclusion in support of consent.

The application does not effectively demonstrate that the development will not adversely affect seabird populations already in decline. This inability places the proposal in direct conflict with national policy, specifically regarding biodiversity protection and the safeguarding of natural assets, as outlined in National Planning Framework 4.

Overall, the significant gaps in evidence and the lack of a robust evaluation of potential impacts lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interact deeply. The application reduces heritage to static, isolated assets instead of acknowledging their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites are active burial grounds and places of spiritual significance, yet the assessment labels them as mere static features, failing to account for their continued relevance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and ignores their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the community's long-standing bond with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity akin to that of Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process. The lack of genuine

engagement calls into question the credibility of the assessment and fails to align with established participation principles in decisions affecting cultural and environmental matters.

There is a crucial procedural oversight regarding the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This lack of assessment alone obstructs a lawful decision.

From a policy standpoint, these shortcomings directly contradict the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historical assets. The failure to account for both tangible and intangible heritage and to recognise ongoing cultural practices clearly deviates from established policy guidelines.

Overall, the neglect to evaluate living heritage, intangible cultural significance, community rights, and necessary statutory assessments results in a major evidential deficiency. The cultural effects of the development remain unexamined, and the application fails to provide an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The Social Impact Assessment commissioned by the developer has not been published in its entirety, leading to a significant evidential gap. This lack of transparency not only hampers the public's understanding but also restricts the competent authority's ability to grasp the full extent of social risks identified through the developer’s own research. Available summaries suggest that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation, yet the failure to disclose the complete assessment limits proper scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these adverse impacts have not been adequately incorporated into the main application or given the weight they deserve. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This situation undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is critical for developments of this nature, especially when community character and functionality may be at stake. The application falls short by not providing the full dataset needed for a thorough assessment of the balance between benefits and harm.

From a policy standpoint, there is a clear failure to comply with National Planning

Framework 4 concerning health and wellbeing. Development projects must foster positive health outcomes and avoid causing harm. Nevertheless, the evidence available points to existing adverse effects that have not been fully disclosed, leaving compliance with this policy unproven.

The procedural implications are profound, as the competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside evidence of adverse effects already in place, renders the assessment incomplete and unreliable, which obstructs a lawful determination and affirms that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

spatial harm that the application does not adequately address.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is at odds with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than something that could be rendered acceptable through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks lacks the necessary detail to adequately evaluate potential environmental effects. There is significant seabed preparation and installation work proposed within a high-energy Atlantic environment, yet the application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be created after consent is granted, which hampers any meaningful assessment of their effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is especially troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these issues.

Further uncertainty surrounds the scale and behaviour of sediment plumes that would result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty also encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application prevents a thorough evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the ability

of the competent authority to properly assess the environmental protection measures before determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent, and without this information, a lawful determination cannot be reached. Moreover, the application does not adequately 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 regarding potential impacts contribute to a materially deficient assessment. These deficiencies hinder a robust evaluation of construction and pollution risks and further underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks detail and does not adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, but the application fails to show how these habitats and uses will be protected or maintained without significant disruption.

A key problem is the assumption that fishing activity can be moved without consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can handle additional pressure. This is important, as displacement could lead to overfishing in other areas and could negatively affect the local fishing fleet's economy. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses significant risks to marine species, particularly due to noise generated during construction. The use of high-energy hammer piling for extended periods is expected to cause disturbance over large areas, which could impact species such as dolphins. The anticipated disturbance to a large part of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without enough supporting evidence.

There is also a clear contradiction within the application. While it acknowledges that licenses are needed to permit harm to European Protected Species, it simultaneously claims that the impacts are negligible. This inconsistency damages the credibility of the assessment and raises issues about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not take into account cumulative impacts from various pressures like habitat disturbance, noise, and fishing activity displacement. Without a thorough evaluation of these combined effects, it is impossible to assess the

overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not consider the full impacts of the project as a whole. The offshore turbines and onshore works are linked but are evaluated separately, which leads to a fragmented analysis that obscures the environmental and socio-economic effects.

Onshore works involve cabling across protected moorland, the construction of a substation near Stornoway, and access routes through sensitive landscapes. These activities include excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application lacks a comprehensive evaluation of these impacts, making it difficult to understand the overall environmental footprint of the project.

By excluding or postponing the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment requires that all project components are examined together, yet the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and communities are not fully acknowledged.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a gap in biodiversity protection.

The proposal also brings up concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that opposes the goals of renewable energy development. The application does not adequately address this matter or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises concerns about the feasibility and legality of implementation.

From a policy standpoint, the failure to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected 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.

Overall, the separation of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, making a lawful determination impossible.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting, which would be visible across long distances, threatens to create a continuous “wall of light” effect on the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate how this lighting will impact visual amenity, landscape character, and the experience for both residents and visitors. This is particularly concerning given the importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. As such, the neglect to consider these impacts leads to a significant gap in the overall landscape and environmental assessment.

Moreover, there is no examination of the effects on nocturnal wildlife. Specific species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to address how aviation lighting might affect these species or contribute to increased mortality rates.

This gap is further highlighted by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activities or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, also face vulnerability to disorientation from artificial light, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

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

From a policy standpoint, the lack of evaluation contravenes National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. This oversight also compromises the broader assessment of landscape and seascape impacts, as the character of the night-time environment is an integral component of the overall landscape.

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

TOURISM

The assessment of tourism impacts associated with the proposed development is fundamentally inadequate, particularly regarding its implications for a critical component of the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. The application acknowledges that a substantial 86% of visitors are attracted by the scenic beauty; however, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has seen considerable growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for approximately 16% of the island's economy. Despite this positive trend, the application neglects to model the potential impact of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Additionally, the assessment overlooks the vital role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in understanding the potential impacts on this recognised and growing segment of the local economy. In a context where the island community faces limited economic diversification, this failure to evaluate tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide the

necessary evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and considering the island's economic dependencies culminate in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the necessary criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing, it lacks a solid evidential foundation.

There are significant gaps in the baseline data presented, an undefined design envelope, unverified mitigation measures, and missing assessments of key impact areas such as nocturnal wildlife, onshore infrastructure, and tourism effects. The Environmental Impact Assessment is thus incomplete, failing to provide a thorough understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to submit a complete Social Impact Assessment is a serious omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal contradicts the National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential burden required to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would lead to substantial and irreversible changes to a sensitive

landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and negative impacts on tourism are all permanent effects that cannot be effectively mitigated.

In summary, the application is procedurally and substantively inadequate for determination. The extensive deficiencies in information, along with policy contradictions and unresolved environmental risks, preclude a lawful and evidence-based decision. It is essential for the competent authority to either reject the consent application on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary information.

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

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: 8CD916C3

Member of the public 1872

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough evaluation of the Environmental Impact Assessment Report and accompanying documentation, which reveal significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely unspoiled environment, and strong cultural heritage. The dimensions, proximity, and overall design of the project raise essential concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful assessment. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The flexible design framework employed inhibits a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a complete or informed assessment of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Substantive conflicts with existing policy are evident. 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 public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

The scale of the project is without precedent in this region, with large turbines proposed in very close proximity to the shoreline. This raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental consequences. In summary, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies illustrate that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for consent fails to fulfil the evidential threshold mandated by the Habitats Regulations, thus failing to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations related to the protection of biodiversity and environmental integrity. It cannot be established that the impacts have been comprehensively assessed or that appropriate safeguards are in place.

The Environmental Impact Assessment Report suffers from material deficiencies and does not provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The flexible Project Design Envelope employed lacks commitment to specific turbine dimensions, layouts, or configurations, which creates significant uncertainty and obstructs a consistent application of a worst-case scenario. This weakness undermines the integrity of the assessment, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are prevented from understanding the true extent of the environmental effects.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Thus, consent is sought on the premise that environmental harm will be addressed subsequently, obstructing any meaningful evaluation of the effectiveness of such measures or assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly established prior to determination.

The report further exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings result in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development application significantly underestimates the importance of cultural heritage and community identity along the West Lewis coastline, neglecting to

recognise it as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. It adopts a simplistic view, regarding heritage merely as a collection of separate, static features, while failing to appreciate their vital social, cultural, and spiritual roles within the community.

A notable shortcoming is evident in the handling of culturally significant locations such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual rituals, yet they are described in the assessment as fixed elements, overlooking their ongoing significance, usage, and the potential repercussions of development on their surroundings. This incorrect categorisation leads to an inadequate evaluation of cultural implications and neglects their integral role in community existence.

Moreover, the assessment does not account for intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely omitted from the evaluation, which represents a considerable gap. Without incorporating these aspects, the cultural consequences of the development cannot be accurately assessed.

Concerns also arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural characteristics akin to those of an Indigenous People, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the credibility of the assessment and fails to adhere to established participation principles regarding decisions that influence cultural and environmental matters.

A crucial procedural flaw lies in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. Without this necessary evaluation, the competent authority is unable to meet its legal obligations to assess the social, cultural, and economic effects on the island community. This omission, in itself, renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, as well as to recognise ongoing cultural practices, clearly contravenes policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural values, community rights, and necessary statutory assessments culminates in a substantial evidential void. The cultural effects of the development have not been adequately appraised, and the application falls short in providing a foundation for understanding the true cultural implications of the proposal.

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment related to seascape, landscape, and visual impacts is insufficient and does not capture the true scale of change or the vulnerability of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a persistent industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately conveys the extent of this visual alteration. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal spots. This would negatively affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not accurately depict this level of impact or its significance within such a delicate landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence that these viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact's magnitude has been downplayed, compromising the assessment's reliability.

Another shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as separate entities, failing to acknowledge their interdependence and resulting in an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that the application has not adequately considered.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is at odds with the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertions of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting change is fundamentally permanent, incapable of being reduced to an acceptable level through mitigation.

In conclusion, the assessment fails to accurately reflect the impact scale, the environment's sensitivity, 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 proposed development presents significant deficiencies in the assessment of construction and pollution risks, which are insufficient for evaluating potential environmental effects. The project entails extensive seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no fully articulated Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application defers mitigation and contingency measures to a post-consent phase, which impedes any substantial assessment of their adequacy or effectiveness.

This approach is particularly troubling given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to both sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to offer adequate detail on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes generated from seabed disruption and cable installation. In the absence of robust modelling and explicit management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these effects. This uncertainty also extends to potential impacts on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of comprehensive emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. An assessment of likely significant effects and their corresponding mitigation must occur prior to consent; where such information is lacking, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks and further reinforce the assertion that the application remains incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive "wall of light" effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological impacts is lacking.

Consequently, without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts since the character of night-time environments is an essential aspect of the overall landscape.

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

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it does not quantify how large-scale offshore infrastructure might influence

visitor numbers, behaviour, or the overall economic contribution from tourism. The assessment of tourism impacts is inadequate and overlooks the economic and social consequences for a vital sector of the Isle of Lewis economy.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Despite this growth, the application fails to analyse how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would bring a net economic benefit or harm an established and expanding sector.

The assessment neglects to evaluate the critical role of environmental quality in sustaining tourism, including the value of unspoiled landscapes and dark skies to the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impact on a recognised and growing part of the local economy.

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

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

Overall, the failure to quantify the impacts on tourism, evaluate environmental factors influencing visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This results in an incomplete application and hinders a thorough evaluation of the economic effects.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably,

there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 846FB66E

Member of the public 1873

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

Dear Sir/Madam

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

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

Substantive policy conflicts are evident. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national requirements to safeguard biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly undermine the statutory tests required for consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly lacking in transparency and therefore cannot meet lawful evaluation standards. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the social risks outlined in the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These findings arise from direct engagement and are firmly grounded in evidence. Nonetheless, the failure to

release the complete assessment restricts thorough scrutiny of its findings, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite these serious implications, they have not been adequately integrated into the main application or assigned appropriate weight. The non-disclosure of the full Social Impact Assessment thus conceals the true human and social costs involved in the development.

This lack of transparency critically undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, particularly where community character and functioning may be compromised. The application, by failing to provide the complete dataset, does not present a thorough evidential foundation needed for assessing the balance between potential benefits and harms.

In terms of policy compliance, the application falls short of demonstrating alignment with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes while avoiding detrimental effects, yet available evidence points to existing adverse impacts that have not been fully disclosed. Without the complete assessment, the claim of compliance with this policy remains unsubstantiated.

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

When considered collectively, the non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This lack of information precludes a lawful determination and supports the conclusion that the application lacks sufficient data.

TOURISM

The application presents a significant evidential gap by failing to adequately assess tourism impacts, which are vital for the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the assessment does not quantify how large-scale offshore infrastructure would affect visitor numbers, behaviour, or the overall economic contribution to the region.

The tourism sector is fundamentally reliant on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While

the application acknowledges that 86% of visitors are attracted by scenery, it fails to consider the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and the wider economic resilience of the community. Without such critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and growing sector.

Moreover, the assessment overlooks the crucial role that environmental quality plays in supporting tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences. The lack of a Dark Skies Assessment further highlights this deficiency, leaving a void in the understanding of impacts on emerging markets, including nature-based tourism and astro-tourism.

In an island community characterised by limited economic diversification, the inadequate evaluation of tourism impacts poses broader implications for employment, local businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, and fails to provide enough evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic dependency culminate in a significant shortfall in the analysis, undermining the robustness of the evaluation of economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application reiterates the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable level of industrialisation. It is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

A reliable and comprehensive evidential basis for the determination is not provided within the application. Significant deficiencies exist in baseline data, including the continued use of an unspecified design envelope and an overreliance on unspecified mitigation measures. Furthermore, crucial impact pathways are omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism

implications. Consequently, the Environmental Impact Assessment is inadequate, failing to allow for a complete understanding of likely significant effects or residual impacts.

There are also significant procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a substantial omission. These issues inhibit the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is inconsistent with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to provide evidence that health and wellbeing impacts are acceptable and lacks modelling of tourism impacts, which undermines claims of a net economic benefit. The cumulative effects of both offshore and onshore components have not been adequately assessed, thereby obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential requirement to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

The proposal is set to 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 connections, along with impacts on tourism, signify permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is obliged either to refuse consent on these bases or to invoke appropriate regulatory measures 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.

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: 0A8FD9E6

Member of the public 1874

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 application is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and a strong cultural identity, as well as its near-pristine environment. A thorough review of the Environmental Impact Assessment Report and supporting documents reveals significant planning, environmental, cultural, and procedural deficiencies that cannot be overlooked.

The proposed development raises serious concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development. The application lacks an adequate evidential basis for lawful determination. Critical environmental data is absent, with baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, which obscures the potential significant effects of the development. The reliance on a flexible design framework, alongside mitigation measures that have yet to be specified, prevents an accurate assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, leaving unsupported claims regarding negligible or non-significant effects.

There are also clear and serious conflicts with established policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal presents major challenges, with large turbines situated close to the shoreline. This proximity raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and incapable of supporting a lawful determination. In this context, it is imperative that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the ornithological environment, particularly given that it is situated within key foraging areas and migratory pathways for seabirds. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide adequate evidence that

these species will not be adversely affected. The assessment lacks a thorough evaluation of the implications of displacement, collision risk, and habitat loss, which are critical factors in understanding the potential impacts on these birds.

There are fundamental contradictions present in the application itself, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically warranted only where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the necessary evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully acknowledged, and the modelling approaches employed create uncertainties, particularly for species in severe decline such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment significantly undermines the transparency necessary for a lawful evaluation of the proposed development. Although the developer engaged local residents through focus groups as part of the Social Impact Assessment, the absence of the complete report creates a substantial evidential gap. This gap hinders both public understanding and the competent

authority's ability to assess the social risks identified through the developer's own research.

Available summaries reveal that residents are currently experiencing measurable levels of stress, anxiety, and concern regarding the scale and proximity of the proposal. These impacts are based on direct engagement, thus are not speculative. However, without access to the full assessment, there is an impediment to scrutinising the findings thoroughly, which in turn restricts the ability to evaluate their significance within the decision-making framework.

Furthermore, the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these implications, they have not been adequately addressed within the main application or given the necessary weight in the evaluation process. The retention of the full Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency not only affects the Social Impact Assessment but also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide the complete dataset means that the application does not offer a full evidential basis to assess the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully acknowledged. Without the full assessment, compliance with this policy cannot be verified.

The procedural ramifications are notable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the unavailability of the complete Social Impact Assessment. This deficiency constitutes a material omission in the application, failing to satisfy the evidential obligations of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with the documented evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reaffirms the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not reflect the sensitivity of the environment or the scale of change. The West Lewis coastline has an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create a

dominant industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application does not represent the extent of this visual change adequately. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which undermines the assessment's reliability.

A significant deficiency is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated rather than interdependent, leading to an incomplete understanding of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This results in broader cultural and spatial harm that has not been adequately assessed in the application.

From a policy perspective, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further questions any claim of policy compliance.

Additionally, it is evident that the impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Therefore, the resulting change is fundamental and permanent, and cannot be reduced to an acceptable level through mitigation.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is not complete and does not adequately consider the impacts of this integrated project. The offshore turbines and the onshore

works are interconnected, yet they are evaluated separately, leading to a disjointed approach that hides the true scale of environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, a substation near Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all components of a project to be evaluated together, but the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully appreciated.

There are notable risks to sensitive habitats, including machair systems and peatland areas that have policy protection. The application does not prove that the impacts on these habitats have been properly assessed or that suitable avoidance measures have been implemented. This creates a significant gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

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

Overall, the separation of project components, the lack of comprehensive assessment, and insufficient evidence regarding environmental and land use impacts make this portion of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment, raising concerns about its completeness. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in

emerging sectors like astro-tourism. The proposal includes the installation of permanent red aviation lighting that would create a continuous "wall of light" effect across the western horizon, fundamentally changing the night-time environment and visual amenity.

Additionally, the application fails to evaluate how this lighting would impact landscape character or affect the experiences of both residents and visitors. This lack of consideration is concerning given the importance of preserving dark skies to the area's identity. There is also a critical failure to assess the impact of the proposed lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting might impact these species or contribute to increased mortality.

This oversight is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not reflect nocturnal activity or the associated risks. Other species, like Kittiwakes, that may forage or migrate at night are also susceptible to disorientation from artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which focuses on protecting natural spaces and maintaining environmental quality. Moreover, it undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the ecosystem.

In summary, the lack of any evaluation of dark skies and nocturnal wildlife leads to a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot adequately support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of

industrialisation on the seascape or the resulting loss of environmental quality. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short in demonstrating compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is presented within a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in the evidential basis for the application hinder its determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the failure to address key impact pathways—including effects on nocturnal wildlife, complete onshore infrastructure, and tourism—renders the Environmental Impact Assessment incomplete. Consequently, it does not provide a full understanding of likely significant effects or residual impacts.

Moreover, there are procedural shortcomings present. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment constitutes a significant omission, preventing the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience. These deficiencies are substantial enough to render the application unfit for determination.

The proposal is also at odds with National Planning Framework 4, failing to safeguard biodiversity, natural landscapes, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, coupled with internal inconsistencies, have not met the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and hinders the ability to lawfully conclude that the impacts are acceptable.

The proposal is poised to cause substantial and irreversible changes to a highly sensitive landscape. It threatens to industrialise the Atlantic-facing coastline, disrupt dark skies, alter cultural and visual relationships, and negatively impact tourism, resulting in permanent effects that cannot be mitigated satisfactorily.

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

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

Additional Comments

Scotland is a beautiful country due to our wild unspoilt landscapes. These projects are not sustainable or green. They are industrial projects that destroy landscapes and CV habitats. Much of the kit is imported and the profits go to a select few, often based overseas. They offer few long term jobs. Species lose out. They are at odds with tourism. Health effects detrimental to anyone unfortunate enough to live nearby. What is the additional energy for? AI data banks in South of England. What are the benefits of AI to most humans. Madness all round.

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: 41C91A3A

Member of the public 1875

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 a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across various dimensions, including 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 identity. Concerns arise from the scale and design of the proposal, particularly regarding its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs 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, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

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 both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which is essential to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison of realistic alternatives based

on their environmental effects, the documentation presents a narrative of the project's evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This area represents a sensitive and biologically vibrant marine system, yet the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a solid evidential foundation for evaluating impacts.

A significant shortcoming involves otters, a species afforded protection under European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their

core foraging range and behaviour results in an insufficient evaluation of the potential effects stemming from construction disturbances, noise, and heightened activity. As a result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate a regular occurrence of these sharks in the waters concerned. The neglect to incorporate or adequately consider such data culminates in an incomplete baseline, further eroding the reliability of the conclusions drawn.

These methodological shortcomings indicate that the assertions of negligible or non-significant effects rely more on assumptions than on sound evidence. The lack of adequate baseline data also hinders a meaningful analysis of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This results in considerable uncertainty about the actual extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime as well as the National Planning Framework 4, due to the improper identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is not legally permissible to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant evidence gaps and internal contradictions that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already facing decline, yet the proposal does not adequately demonstrate, to the necessary evidential standard, that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, but the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A critical inconsistency is evident in the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. This

contradiction raises serious questions about the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence.

The assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not properly considered, and the reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is insufficient and behavioural responses are inadequately understood.

Placing turbines within a recognised migratory corridor introduces considerable risk, effectively 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 in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with 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, inhibiting any lawful conclusion in favour of consent.

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

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These issues impede a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a dynamic cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the current assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive perspective, treating heritage merely as isolated, static assets and 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 as static features, disregarding their continued use and the ramifications of development on their

surroundings. This mischaracterisation leads to a flawed evaluation of cultural effects and ignores their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language and traditions that underpin the community's identity and its relationship with the coastal environment. These elements are notably absent from the assessment, representing a significant oversight. Without incorporating these factors, the full cultural impact of the development remains elusive.

Concerns extend to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, yet the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement diminishes the legitimacy of the assessment and does not align with established principles for participation in matters impacting cultural and environmental interests.

Additionally, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission inhibits the competent authority's legal obligation to assess the social, cultural, and economic implications for the island community, resulting in a failure to meet statutory requirements.

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, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy obligations.

Collectively, the lack of assessment for living heritage, intangible cultural values, community rights, and adherence to statutory mandates leads to a substantial evidential gap. Consequently, the cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment raises serious concerns regarding the adequacy of the application and its adherence to the necessary legal standards for evaluation. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This lack of transparency results in a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks highlighted in the developer's own research.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts have been identified through direct engagement and are not merely conjectural. However, the absence of the full assessment hampers proper scrutiny of these findings and diminishes the ability to assess their significance in the decision-making process.

The proposal is also perceived as a threat to community identity and cohesion, with references to "cultural loss" found within the developer's own findings. Yet, these impacts have not been thoroughly incorporated into the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency significantly 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. Without the complete dataset, the application fails to provide a full evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the existing evidence points to adverse effects that have not been fully disclosed. In the absence of the complete assessment, demonstrating compliance with this policy is impossible.

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

In conclusion, the combination of non-disclosure of the complete Social Impact Assessment and evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to appropriately capture the scale of change and the sensitivity of the receiving environment. The character of the West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large-scale turbines close to 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.

There is an inadequate representation of the extent of visual change in the application. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct negative impact on visual amenity, compromising the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Additionally, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been downplayed, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these cultural assets as separate entities, disregarding 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 vital relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This shift represents not just a visual impact but a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case scenario assessment further challenges any claims of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Therefore, the resulting change is fundamentally permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, hindering any meaningful assessment of their adequacy or effectiveness.

The deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether appropriate safeguards are established to respond to pollution incidents. This procedural risk undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation be assessed before consent; without such information, a lawful determination cannot be achieved. The application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts renders the assessment materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the impacts on fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic factors. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, there is no demonstration that these vital habitats and activities can be preserved without significant disruption.

A major concern is the assumption that fishing activity can simply be relocated without adverse effects. The application does not provide evidence regarding the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This oversight is critical because displacing fishing efforts could lead to overfishing in other areas and result in broader economic repercussions for the local fishing fleet. Without a rigorous, evidence-based assessment, the implications for both fisheries and

livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. Extended periods of high-energy hammer piling are expected to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population raises serious issues. Yet the application minimises these effects without adequate supporting evidence, which is concerning.

Moreover, there exists a contradiction within the application regarding the need for licences to authorise harm to European Protected Species while concurrently classifying the impacts as negligible. This inconsistency undermines the reliability of the assessment and raises questions about compliance with the Habitats Regulations, especially in contexts where harm is anticipated to a level requiring legal permission.

Additionally, the assessment overlooks cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects means that the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application does not meet the standards set by National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion regarding its sustainability.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves an integrated project that includes both offshore turbines and onshore infrastructure. However, the assessment of the onshore elements is incomplete, failing to consider the full extent of the impacts. This separation of the offshore and onshore components results in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore works include cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. Without a comprehensive evaluation of these impacts, there is a lack of understanding regarding the project's overall environmental footprint.

By not fully assessing onshore impacts, the application fails to facilitate an accurate

evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered together, yet the current division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not thoroughly understood.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises concerns about carbon balance. Disturbance of the peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application fails to adequately address this matter or to show that the overall carbon balance remains beneficial.

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

From a policy standpoint, the failure to assess the project holistically 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 validity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in enhancing environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, which would be visible over long distances, is set to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to assess the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly crucial given the value of dark skies to the identity of the area and its emerging tourism sectors, such as astro-tourism. The lack of consideration for these impacts indicates a significant deficiency in the overall landscape and environmental

assessment.

Equally concerning is the absence of an evaluation regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collisions. The proposal does not include any form of lighting impact assessment or phototaxis study, thus neglecting to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This deficiency is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, the omission contravenes the National Planning Framework 4 regarding the safeguarding of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider analysis of landscape and seascape impacts, as the character of night-time is an integral component of the environment.

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

TOURISM

The assessment of tourism impacts is fundamentally inadequate, failing to analyse the economic and social consequences for a vital sector on the Isle of Lewis. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it neglects to provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Nonetheless, the application does not model the potential impacts of

seascape industrialisation and loss of environmental quality on Tourism Gross Value Added or broader economic resilience. Without such analysis, it is impossible to ascertain whether the development would generate a net economic benefit or jeopardise an established and expanding sector.

The assessment also fails to account for the significance of environmental quality in enhancing tourism, specifically the importance of unspoiled landscapes and dark skies to the visitor experience, as well as the growth of markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leading to a considerable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

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

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

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and recognise the island's economic dependency creates a significant evidential gap. This obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

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: E7D3AA50

Member of the public 1876

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

Dear Sir/Madam

This representation serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system that has not been adequately assessed in relation to marine ecology and protected species. The existing assessment fails to provide a complete and reliable understanding of ecological receptors, as it is based on incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat

use of various species. This inadequacy means that any evaluation of potential impacts is fundamentally flawed.

Particularly concerning is the treatment of otters, a European Protected Species, which are not properly recognised in the application. Their active use of coastal areas for foraging and movement has not been sufficiently assessed, with the core foraging range and behavioural patterns overlooked. This lack of consideration means that the potential impacts from construction disturbance, noise, and increased human activity have not been effectively evaluated, undermining any conclusions about the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence in these waters. This is especially concerning given that established land-based observations indicate a frequent use of the area by these sharks. The failure to incorporate or adequately consider such critical data results in an incomplete baseline and weakens the reliability of the conclusions presented.

These methodological shortcomings lead to conclusions about negligible or non-significant effects that are primarily based on assumptions rather than sound evidence. The lack of adequate baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the actual risks facing 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 protected species. This uncertainty introduces challenges in excluding adverse effects beyond a reasonable scientific doubt, engaging the precautionary principle. In light of these circumstances, granting consent would not be legally justifiable.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment characterised by significant evidence gaps and internal contradictions that undermine its validity. It is crucial to highlight that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already declining. Despite this, the application fails to satisfy the evidential requirements to demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory pathways, yet the assessment inadequately

addresses the risks of displacement, collision, or habitat loss.

Moreover, a core inconsistency emerges in the application, as the developer claims no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising serious questions about the assessment's reliability and suggesting that its conclusions lack support from the underlying evidence. The assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces further uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline. Furthermore, the applied methodologies are likely to underestimate mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within an acknowledged migratory corridor introduces additional and significant risks, effectively forming a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor and the potential impact on species with relatively small global populations are not sufficiently evaluated in the application.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation activates the precautionary principle, which precludes a lawful conclusion in favour of consent. Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such deficiencies obstruct a thorough evaluation of impacts and substantiate the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks adequate assessment of social impacts, health, and wellbeing, which is crucial for lawful evaluation. The developer initiated a Social Impact Assessment that included focus groups with local residents, yet the full report has not been made public. This creates a significant gap in evidence and hinders both the public and the competent authority from fully understanding the social risks highlighted in the developer’s own research.

Available summaries show that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, not speculation. However, the lack of access to the complete assessment hampers proper scrutiny and limits the ability to assess their importance in the decision-making process.

Evidence also suggests that the proposal is seen as a direct threat to community identity and cohesion, with the developer's findings indicating potential "cultural loss." Nevertheless, these impacts have not been adequately incorporated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment clouds the understanding of the true human and social costs associated with the development.

This lack of transparency affects the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality may be at stake. The application fails to provide a complete evidential basis needed to weigh the benefits against potential harm.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and prevent harm, yet available evidence points to existing adverse effects that remain undisclosed. Without the full assessment, it cannot be confirmed that the application complies with this policy.

The procedural consequences are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission represents a material flaw in the application and does not meet the evidential standards required under the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, along with evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application lacks sufficient information for proper consideration.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is severely lacking, failing to adequately reflect both the sensitivity of the receiving environment and the scale of the proposed changes. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would result in a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The proposal does not adequately convey the extent of this visual change. The proximity

and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and erode the defining attributes of naturalness and remoteness. Moreover, the assessment fails to fully articulate the significance of these impacts in the context of such a sensitive landscape.

Methodological issues are also present in 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 raises the possibility that the visual impact has been understated, thus compromising the reliability of the assessment.

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

The potential industrialisation of the seascape could sever these crucial relationships, transforming the context in which heritage assets are perceived and interrupting their connection to the natural horizon. This not only constitutes a visual impact but also represents broader cultural and spatial harm that has not been sufficiently assessed in the application.

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

Additionally, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resultant change would be fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to accurately portray the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

Moreover, there is a notable uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

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

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

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

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.

TOURISM

The assessment regarding tourism impacts is significantly lacking and does not address the economic and social repercussions for a crucial part of the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. The application itself notes that

86% of visitors are attracted by the scenery, yet it fails to provide any measurable analysis on how extensive offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contributions.

The tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and degradation of environmental quality might affect Tourism Gross Value Added or the overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic advantage or harm an established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality in fostering tourism, including the critical role of pristine landscapes and dark skies in shaping visitor experiences and capitalising on new markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

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

Altogether, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependence leads to a significant evidential gap. This undermines a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application echoes the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains insufficient.

The application lacks a comprehensive and reliable evidential foundation for decision-

making. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been adequately conducted, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties and potential risks to the environment. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Allturbines drip oil from blades, destroying whatever is underneath, be it land or water.

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: E64BDAED

Member of the public 1877

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system that has not been adequately assessed in relation to marine ecology and protected species. The existing assessment fails to provide a complete and reliable understanding of ecological receptors, as it is based on incomplete baseline data and methodologies that do not adequately capture the presence, behaviour, and habitat use of various species. This inadequacy means that any evaluation of potential impacts is fundamentally flawed.

Particularly concerning is the treatment of otters, a European Protected Species, which are not properly recognised in the application. Their active use of coastal areas for foraging and movement has not been sufficiently assessed, with the core foraging range and behavioural patterns overlooked. This lack of consideration means that the potential impacts from construction disturbance, noise, and increased human activity have not been effectively evaluated, undermining any conclusions about the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence in these waters. This is especially concerning given that established land-based observations indicate a frequent use of the area by these sharks. The failure to incorporate or adequately consider such critical data results in an incomplete baseline and weakens the reliability of the conclusions presented.

These methodological shortcomings lead to conclusions about negligible or non-significant effects that are primarily based on assumptions rather than sound evidence. The lack of adequate baseline data also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the actual risks facing 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 protected species. This uncertainty introduces challenges in excluding adverse effects beyond a reasonable scientific doubt, engaging the precautionary principle. In light of these circumstances, granting consent would not be legally justifiable.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are interconnected. However, the assessment of cultural

heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated and static, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active burial and spiritual places. Yet, these are mischaracterised as static features in the assessment, which fails to acknowledge their continued use, meaning, and the potential impact of development on their setting. This oversight leads to an incomplete evaluation of cultural effects and neglects their significance in community life.

The assessment also overlooks intangible cultural heritage, such as the Gaelic language and traditions, along with the deep connection between the community and the coastal environment. These aspects are vital to the identity of the area and their absence signifies a significant omission. Without addressing these factors, the cultural impact of the development cannot be accurately assessed.

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

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a substantial

evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and harm.

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

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks presented in the application is materially deficient, lacking the necessary detail to effectively evaluate potential environmental impacts. The proposal involves significant seabed preparation and

installation activities within a challenging high-energy Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be established after consent, which inhibits any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application does acknowledge risks associated with sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient details on the prevention, control, or monitoring of these risks.

Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats that have been recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed before consent is granted. In the absence of this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts collectively render the assessment incomplete. These shortcomings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is fundamentally flawed.

FISHERIES AND MARINE LIFE

The application presents a concerningly incomplete assessment of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not adequately demonstrate how these vital habitats and activities can be preserved without causing significant disruption.

A major flaw is the assumption that fishing activity can be relocated without negative consequences. There is no evidence provided to indicate that alternative fishing grounds are available or capable of accommodating the additional pressures that would arise from such displacement. This gap in information is crucial, as it poses the risk of overfishing in other areas and could have far-reaching economic effects on the local fishing fleet. Without a solid, evidence-based assessment, the consequences for fisheries and livelihoods remain unclear.

Additionally, there are serious risks introduced to marine species, particularly due to the noise generated by construction activities. High-energy hammer piling is expected to create disturbances over considerable distances, potentially affecting species including dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises critical concerns. Unfortunately, the application downplays these effects, lacking the necessary supporting evidence to justify such minimisation.

There exists a troubling inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged while simultaneously stating that the impacts are negligible. This contradiction undermines the assessment's credibility and raises significant concerns about compliance with the Habitats Regulations, especially given that anticipated harm may require legal authorisation.

Furthermore, the application neglects to account for cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be properly ascertained.

From a policy standpoint, the application fails to align with the requirements set forth by the National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or avoid adverse impacts on marine biodiversity, thereby precluding any assertion that this proposal constitutes sustainable development.

In summary, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies all contribute to an incomplete and unreliable assessment. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application does not adequately assess the onshore infrastructure, resulting in a material incompleteness that obscures the true extent of impacts from this integrated project. The offshore turbines and the onshore works are intrinsically connected, yet they are evaluated separately. This fragmented approach fails to provide a full

understanding of the environmental and socio-economic effects.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment of these impacts hinders a clear understanding of the project's overall environmental footprint.

Excluding or deferring the assessment of onshore impacts obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, but the division between offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities are not fully comprehended.

Significant risks to sensitive habitats exist, including machair systems and peatland environments that are subject to policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been put in place, revealing a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbance of peatland leads to the release of stored carbon, potentially incurring a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, which play a vital role in shaping the

area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would drastically change the night-time environment.

Furthermore, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the local identity and the growing tourism sectors, such as astro-tourism. The failure to address these impacts signifies a clear gap in the overall assessment of landscape and environmental factors.

Most importantly, there is no analysis of the potential effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased collision risk. The application lacks any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal behaviour or the associated risks. Kittiwakes, for instance, may forage or migrate at night and could be similarly affected by disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding ecological impacts.

Without a comprehensive assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites might be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and the quality of the environment. Moreover, it undermines a broader assessment of landscape and seascape impacts, as the character of night-time environments is integral to overall environmental quality.

Overall, the lack of assessment concerning dark skies and nocturnal wildlife constitutes a considerable evidential gap. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful determination.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social consequences for a vital part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of

visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application fails to consider how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to determine if the proposed development would yield a net economic benefit or detrimentally impact an established and expanding sector.

Moreover, the assessment does not address the critical role of environmental quality in sustaining tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in understanding the implications for a recognised and burgeoning segment of the local economy.

In a community with limited economic diversity, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a thorough Island Communities Impact Assessment means these economic vulnerabilities have not been examined as required under the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic dependencies results in a significant evidential void. This inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as determined by statutory duties, national policy, and evidential standards. It mirrors the core issues of the 2008 Lewis Wind Power proposal refusal, where the degree of industrialisation was deemed unacceptable. This current application is presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the evidential basis necessary for proper

determination. The reliance on an undefined design envelope, unspecified mitigation measures, and the omission of key impact pathways, such as those related to nocturnal wildlife, full onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. This inadequacy obstructs a full understanding of the likely significant effects and residual impacts of the proposal.

There are also significant procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a comprehensive Social Impact Assessment represents a material omission. These deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It fails to establish that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been adequately assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty remains regarding environmental risks, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

It is therefore 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: 5EBD3712

Member of the public 1878

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

The unprecedented scale of the proposal in this area, with large turbines being positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, lacking a comprehensive and reliable understanding of the ecological receptors present in this sensitive and biologically rich marine system. The methodologies employed are inadequate, resulting in incomplete baseline data that fails to accurately capture the presence, behaviour, and habitat use of various species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant oversight concerns otters, which are recognised as a European Protected Species. The application does not adequately acknowledge or assess the active use of coastal areas by otters for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbances, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to result in an underestimation of the presence of basking sharks, especially in light of established land-based observations that indicate these waters are frequently used by them. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the true scale of risk posed to marine species and their habitats.

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

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration is fundamentally flawed due to significant gaps in evidence and internal inconsistencies within the ornithological assessment, which

severely undermine its conclusions. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, many of which are already in decline, are present. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected.

There exists a critical contradiction in the application, as the developer asserts there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the importance of these feeding grounds is inadequately addressed, and the reliance on modelling techniques introduces uncertainty, especially for species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not thoroughly understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold required to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been reached. This activates the precautionary principle and hinders a lawful conclusion in favour of consent.

Additionally, the identified deficiencies reflect 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 directly conflicts with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a thorough evaluation of impacts and leading to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously flawed, neglecting the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow perspective, viewing heritage merely as a collection of

disconnected, static entities instead of recognising their ongoing social, cultural, and spiritual relevance to the community.

The assessment significantly underrepresents culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which remain active sites for burial and spiritual practices. Instead of acknowledging their ongoing use and significance, the assessment inaccurately categorises them as static features, overlooking how development may impact their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural repercussions and fails to appreciate their importance in community life.

Additionally, there is a striking omission in addressing intangible cultural heritage, which encompasses the Gaelic language, traditional practices, and the long-standing bond between the community and the coastal environment. These aspects are vital to the area's identity yet are entirely absent from the evaluation, representing a major oversight. Without incorporating these factors, the development's cultural impacts cannot be adequately assessed.

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

A significant procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligations to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings put the proposal in clear opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices demonstrates a clear deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and compliance with statutory requirements results in a significant gap in evidence. The cultural impacts of the proposed development have not been thoroughly assessed, and the application lacks a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is concerning and indicates a material deficiency that undermines lawful

evaluation. Although the developer commissioned a Social Impact Assessment, which included focus groups with local residents, the full report remains unpublished. This gap in evidence significantly hinders both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Summaries that are available reveal that residents are already dealing with measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. However, the absence of the full assessment obstructs proper scrutiny of these findings, limiting the capacity to fully appreciate their significance in the decision-making process.

Moreover, there is evidence to suggest that the proposal poses a threat to community identity and cohesion, with "cultural loss" explicitly noted in the developer's findings. Regrettably, these impacts have not been properly integrated into the main application or given the appropriate consideration they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency also impacts the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this nature, especially where community character and functioning are at risk. The omission of the full dataset renders the application inadequate for presenting a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not convincingly demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development is expected to promote positive health outcomes and mitigate harm, yet the evidence at hand indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

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

In summary, the failure to disclose the complete Social Impact Assessment, alongside the documented evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the absence of comprehensive assessment regarding construction and pollution risks. It involves significant seabed preparation and installation activities in a challenging Atlantic environment, yet lacks

fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be established after consent, hindering any effective evaluation of their sufficiency or reliability.

This reliance on undefined future measures is particularly alarming given the sensitivity of the West Lewis coastline, which supports clean coastal waters and critical habitats susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer adequate detail on the preventive, control, or monitoring strategies that will be employed.

Furthermore, there is considerable uncertainty concerning the scale and dynamics of sediment plumes generated from seabed disturbances and cable installations. Without robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is further compounded by potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application undermines the ability to determine whether suitable safeguards are in place to address pollution events. This not only introduces procedural risk but also diminishes the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be reviewed prior to consent, and the absence of such critical information obstructs a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts create a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the impacts on both fisheries and marine life. An essential aspect of the application is the inadequate assessment of ecological and socio-economic factors. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the application does not adequately demonstrate how these vital habitats and activities will be safeguarded from potential disruption.

A critical flaw in the assessment is the assumption that fishing activities can simply be relocated without adverse effects. The application lacks concrete evidence that alternative fishing grounds are viable or can accommodate the additional fishing pressure that might arise from displacing current operations. This gap is concerning, as such displacement could lead to overfishing in other areas, with significant economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based analysis means that the potential impacts on both fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to the underwater noise generated during construction activities. The anticipated use of high-energy hammer piling for an extended duration is expected to create disturbances over large areas, adversely affecting species like dolphins. Notably, the forecasted disturbance to a significant portion of the local bottlenose dolphin population is troubling. However, the application tends to minimise these concerns, lacking the requisite supporting evidence to substantiate its claims.

There exists a troubling inconsistency within the application regarding the treatment of European Protected Species. While it acknowledges the need for licenses to permit harm, it simultaneously classifies the associated impacts as negligible. This contradiction calls into question the validity of the assessment and raises significant concerns about compliance with the Habitats Regulations, particularly when potential harm requires legal authorisation.

Furthermore, the assessment fails to account for the cumulative impacts stemming from multiple factors, such as habitat disturbance, noise pollution, and fishing activity displacement. Without a thorough analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 or the National Marine Plan. It does not adequately prove that the proposed development can coexist with existing marine users or that it will not lead to unacceptable impacts on marine biodiversity, thereby hindering any conclusion regarding its sustainability.

In summary, the inadequacies in addressing fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment culminate in a document that is incomplete and unreliable. These shortcomings impede a comprehensive evaluation of the effects on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the principles of sustainable development as defined by statutory duties and national policy. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation

was a central concern. Now, despite a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and community welfare, the application falls short.

There are substantial gaps in the evidential basis necessary for a thorough determination. Baseline data is incomplete, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways have been omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, hindering a complete understanding of potential significant effects or residual impacts.

Moreover, procedural failures are apparent. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal directly contradicts the principles set forth in National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to missing tourism impact assessments. Additionally, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with 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.

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: B218E80E

Member of the public 1879

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, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale and design of this proposal, along with its proximity to the shoreline, give rise to significant concerns regarding its compatibility with statutory requirements and national policy, particularly in relation to sustainable development principles.

A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible effects lack robust supporting evidence.

Policy conflicts are evident and substantive. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy discrepancies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to conclude that the development aligns with policy standards.

The unprecedented scale of the proposal, involving large turbines in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient 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 issues, the precautionary principle should be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the methodologies employed are inadequate, with incomplete baseline data that does not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment does not furnish a sound evidential basis for evaluating potential impacts.

One major shortcoming is the assessment of otters, a European Protected Species, where their active use of coastal areas for foraging and movement has not been properly recognised or evaluated. The omission of their core foraging range and behavioural patterns means that potential effects from construction disturbance, noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions regarding the absence of significant effects on otters.

Further issues arise in the evaluation of basking sharks, which relies on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological flaws lead to outcomes of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level 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 it has not properly identified or assessed protected species. The uncertainty that arises from these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

Collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies inhibit a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is critically inadequate and lacks the necessary transparency for a lawful assessment. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report has not been made

available. This gap in evidence significantly hinders both public understanding and the competent authority's ability to grasp the full scope of social risks identified by the developer's own research.

Summaries that are currently available reveal that residents are already suffering from notable stress, anxiety, and concerns linked to the scale and proximity of the development. These impacts arise from direct interactions with the community, thus are not merely speculative. Nevertheless, the decision not to release the full assessment obstructs meaningful examination of these findings and restricts the capacity to evaluate their relevance in the decision-making process.

Moreover, there is clear indication that the proposal is regarded as a direct threat to community identity and cohesion, with “cultural loss” flagged in the developer's own findings. Despite this recognition, such impacts have not been adequately incorporated into the principal application or given the necessary emphasis. The decision to withhold the complete Social Impact Assessment obscures the genuine human and social costs of the development.

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

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

The procedural consequences are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This oversight constitutes a material deficiency within the application and signifies a failure to fulfil the evidential criteria set out by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the comprehensive Social Impact Assessment, coupled with evidence of ongoing negative impacts, leads to an incomplete and unreliable assessment. This undermines the legitimacy of the determination process and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted on seascape, landscape, and visual impacts lacks sufficient detail and does not accurately reflect the scale of change or the sensitivity of

the surrounding environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. Introducing large-scale turbines near the shoreline would create an industrial presence that is both continuous and dominant, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately depict the extent of visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not effectively convey the significance of this impact within such a sensitive landscape context.

Methodological issues also arise concerning how visual viewpoints were chosen and presented. Evidence suggests that some viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding critical cultural heritage sites and valued landscapes. This raises concerns that the visual impact's magnitude may have been understated, which in turn compromises the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are not isolated; they are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment fails to acknowledge this interdependence, leading to an incomplete understanding of the impacts on both their setting and cultural significance.

Industrialising the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This presents not just a visual issue, but also cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resultant change is therefore fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage.

These shortcomings prevent a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment that fails to consider the full impacts of what is essentially a single integrated project. The offshore turbines are directly linked to the onshore works, yet the separation in their evaluation obscures the true scale of the environmental and socio-economic effects.

Included in the onshore elements are cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. These constructions involve the excavation of deep peat, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application does not adequately assess these impacts, which hinders a complete understanding of the project's overall environmental footprint.

The failure to assess onshore impacts either thoroughly or at all prevents a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, all project components must be considered collectively; however, by treating offshore and onshore elements as distinct, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Sensitive habitats such as machair systems and peatland environments, which are subject to policy protection, face significant risks from this proposal. There is no evidence presented that these impacts have been fully considered or that appropriate avoidance measures have been implemented, leading to a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland could release stored carbon, creating a potential carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance will remain beneficial.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or procedures have been initiated, which raises serious questions about the feasibility and legal compliance of the implementation.

From a policy standpoint, the lack of a comprehensive assessment of the project, particularly regarding the protection of peatlands, habitats, and land use interests, is in conflict with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's reliability.

Overall, the separation of project components, the absence of a thorough assessment,

and the lack of evidence regarding environmental and land use impacts make this part of the application incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism. However, 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. The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, overlooking the significance of dark skies for the area’s identity and emerging tourism sectors such as astro-tourism.

Moreover, there is a troubling absence of any 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 due to their phototactic responses, which may lead to disorientation and increased collision risks. The application does not include any lighting impact assessment or phototaxis study, meaning it neglects to assess how the proposed aviation lighting could affect these species or contribute to mortality rates.

This lack of assessment is further exacerbated by the reliance on daytime survey data within the ornithological assessment, failing to capture nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data results in a critical gap in the understanding of ecological impacts.

Without a comprehensive assessment 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 impacts beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing lawful determination of the application.

From a policy perspective, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, this lack of evaluation undermines the broader assessment of landscape and seascape impacts, as night-time character is integral to the environment.

Collectively, the failure to assess dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application lacks a thorough assessment of tourism impacts, failing to address the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application does not provide any quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs. It accounts for as much as 16% of the island's economy. However, the application fails to model the potential impacts of seascape industrialisation and the associated loss of environmental quality on Tourism Gross Value Added or overall economic resilience. Without such analysis, it remains unclear if the development could yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the assessment neglects to consider the critical role of environmental quality in enhancing tourism, including the significance of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

In an island community with limited economic diversification, the disregard for tourism impact assessments carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been 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 necessity to show net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the lack of quantification regarding tourism impacts, the failure to assess environmental influences on visitor behaviour, and the neglect of the island's economic reliance culminate in a significant evidential gap. This ultimately obstructs a rigorous evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as mandated by statutory duties, national policy, and evidential standards. It echoes the same principal concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extensive

industrialisation proposed was deemed unacceptable. Although presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not provide a thorough or reliable evidential foundation for decision-making.

There are notable deficiencies in baseline data, and the application relies on a vaguely defined design envelope. It also depends on unspecified mitigation measures and neglects critical impact pathways, including the effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a complete understanding of significant likely effects or residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory requirements under the Islands (Scotland) Act 2018, while the failure to present the 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, rendering the application unfit for determination.

The proposal also contradicts National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, fails to assure that health and wellbeing impacts are acceptable, and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly evaluated, leaving obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially grave. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unsuitable for determination. The abundance of information gaps, policy discrepancies, and unresolved environmental risks precludes a lawful, evidence-based decision. The competent authority must either deny consent on these grounds or exercise the relevant regulatory provisions to request the missing information.

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

Additional Comments

Whilst not a resident we too live in a coastal area of outstanding natural beauty in the NW Highlands of Scotland and as such have grave concerns regarding this proposed wind farm. We believe it will have far reaching consequences for the local residents, tourism, wildlife, night skies (light pollution) and general way of life for the local community. We would ask that you take into account these concerns and abandon the plan forthwith!

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: B9842ADA

Member of the public 1880

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive, transparent, or trustworthy analysis of the potential environmental consequences of the proposed development. The application's use of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation undermines the credibility of the

assessment, meaning that the impacts discussed may not accurately represent the final development, thus hindering both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Consent is being sought with a heavy reliance on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. This approach postpones the assessment of environmental harm to a later stage, which diminishes the opportunity for a meaningful evaluation of the effectiveness of those measures or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigations be clearly identified before determination.

Additionally, the report presents considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where assertions of negligible or non-significant effects are made without strong supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are established.

In summary, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and rigorous evaluation of environmental effects and indicate that the competent authority cannot make a decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives within the application is significantly lacking and fails to comply with the statutory obligations of the Environmental Impact Assessment regime. Instead of offering a thorough and structured comparison of viable alternatives based on their environmental effects, the application merely recounts the project's development history. This narrative does not adequately illustrate that less harmful options have been appropriately identified, evaluated, and favoured over more detrimental choices.

There is a notable absence of a transparent, evidence-based comparison of various offshore sites, development scales, or design configurations. Specifically, the

developer has not convincingly explored the possibility of situating turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity and the crucial role of proximity to the shore in assessing impact render this omission particularly significant. Consequently, it is impossible to assert that the proposed location is indeed the least harmful option.

This lack of thorough assessment also extends to cable routing and landfall considerations, where 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 present a clear avoidance strategy and the absence of comparative analysis indicate that the approach taken lacks mitigation by design, relying instead on post-design measures.

Therefore, the application does not sufficiently show that environmental harm has been minimised through careful site selection, layout decisions, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal aligns with sustainable practices or meets policy requirements.

From a policy standpoint, this inadequacy raises concerns about compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant gap that contributes to the overall conclusion that the application has not undergone sufficient scrutiny and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

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

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity fails to adequately acknowledge the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interwoven. The application approaches heritage in a reductive manner, treating it as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they are categorised as static features in the assessment. This oversight fails to recognise their continued use and meaning, as well as the development's potential impact on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and neglects their vital role in community life.

Moreover, the application neglects intangible cultural heritage, such as the Gaelic language, local traditions, and the long-standing bond between the community and the coastal environment. These aspects are integral to the identity of the area and are conspicuously missing from the assessment, representing a substantial omission.

Without accounting for these factors, it is impossible to fully grasp the cultural impact of the proposed development.

Additional concerns arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, which aligns with recognised characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

A significant 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 impedes the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies put the proposal at odds with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, constitutes a clear violation of policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report has not been made public. This situation creates a significant evidential gap that hinders both the public and the competent authority from fully understanding the social risks identified through the developer's own research. Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore based on real experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer’s own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the weight they deserve. The lack of disclosure regarding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not offer a thorough evidential basis 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 should foster positive health outcomes and avoid harm, yet the evidence currently available indicates adverse effects that have not been fully disclosed. Consequently, it cannot be established that compliance with this policy is met in the absence of the full assessment.

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

Overall, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortcoming prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal significantly undermines the assessment of seascape, landscape, and visual impacts, failing to adequately capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the shoreline would establish a persistent industrial presence, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

The application does not sufficiently illustrate the extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately reflects this level of impact or its significance within such a sensitive landscape.

Methodological issues arise regarding the selection and representation of visual viewpoints. There is evidence indicating that the viewpoints chosen may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, which compromises the reliability of the

assessment.

Furthermore, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. The assessment treats these important assets in isolation, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural importance.

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

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

It is evident that the impacts noted cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting transformation is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to adequately assess the ecological and socio-economic impacts, raising immediate concerns about the protection and maintenance of these vital uses and habitats. A significant issue lies in the unfounded assumption that fishing activities can simply be displaced without repercussions. The absence of evidence regarding the availability, accessibility, and capacity of alternative fishing grounds is critical, as such displacement could lead to overfishing elsewhere and potentially threaten the livelihoods of the local fishing fleet. The implications for fisheries and local economies cannot be properly understood without a thorough, evidence-based assessment.

Moreover, the proposal poses substantial risks to marine species, particularly due to underwater noise from construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt a wide area, with notable effects on species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts, lacking the necessary supporting evidence to justify this downplaying.

There exists a contradiction within the application: while it acknowledges the

requirement for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially given that anticipated harm might necessitate legal authorisation.

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

From a policy standpoint, the application does not satisfy the requirements of the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding the proposal's sustainability.

In summary, the deficiencies regarding evidence of fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely undermine the assessment's completeness and reliability. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries, necessitating immediate action to address these critical concerns.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The environmental assessment of the onshore infrastructure associated with this project is fundamentally lacking and fails to account for the comprehensive impacts of what constitutes a single integrated initiative. The offshore turbines and the related onshore works are interconnected; however, they are evaluated independently, leading to a disjointed approach that obscures the full extent of environmental and socio-economic repercussions.

The onshore aspects of the proposal involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities include excavation across regions of deep peat, particularly in Barvas Moor, which is an important carbon store and an ecologically delicate habitat. The application lacks a thorough examination of these impacts, hindering a complete understanding of the project's overall environmental implications.

By neglecting to assess the onshore impacts or deferring such evaluations, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project are considered collectively; yet, the division between offshore and onshore components means that the cumulative impacts on peatlands, habitats, and local communities are inadequately understood.

There are also substantial threats to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a significant evidential void concerning biodiversity conservation.

Additionally, the routing of infrastructure through active croft land raises concerns about potential conflicts with current land use and legal rights. The application does not present evidence that the required consents or processes have been set in motion, raising doubts about the feasibility and lawful execution of the project.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate adequate protection for peatlands, habitats, and land use interests contravenes 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 disaggregation of project components, the lack of a thorough assessment, and the absence of evidence regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, ultimately obstructing a lawful determination.

TOURISM

The assessment of tourism impacts presented in the application is significantly lacking, particularly in its failure to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which heavily relies on the area's stunning coastline, almost untouched landscapes, dark skies, and sense of seclusion, has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite the application noting that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution from tourism.

Moreover, the application neglects to model the potential impacts of the industrialisation of the seascape and deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the area. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect this established and expanding sector.

The role of environmental quality in enhancing tourism is another critical oversight, as unspoiled landscapes and dark skies significantly contribute to the visitor experience, particularly in emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment amplifies this shortcoming, creating a considerable gap in understanding the effects on a vital and growing component of the local economy.

In an island community where economic diversification is limited, the failure to assess

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

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence result in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development, as evaluated against statutory duties, national policy, and evidential standards. The application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

There are significant deficiencies in the evidential basis provided for the determination of the application. The baseline data is incomplete, and there remains an undefined design envelope. It relies on unspecified mitigation measures and omits crucial impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a full understanding of the likely significant effects or residual impacts.

Additionally, procedural errors are apparent. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the complete Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

The proposal stands in direct opposition to National Planning Framework 4, failing to ensure the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance,

habitats, and crofting land.

Uncertainty surrounds environmental risks, which may be significant. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and adverse effects on tourism will yield permanent impacts that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of informational deficiencies, alongside conflicts with policy and unresolved environmental risks, inhibits a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or implement relevant regulatory provisions to necessitate 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.

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: 845BB538

Member of the public 1881

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

Dear Sir/Madam

This representation serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces heritage to isolated, static elements, overlooking their ongoing significance within the community.

A notable shortcoming is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites of burial and spiritual practice. The assessment incorrectly categorises these as static features, neglecting their continuous use and the implications of development on their surrounding environment. This misunderstanding leads to an incomplete appraisal of cultural effects, disregarding their integral part in community life.

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal environment, further compounds these issues. These aspects are vital to the area's identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the development remains misunderstood.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been involved in a Free, Prior and Informed Consent process. This lack of genuine engagement calls into question the validity of the assessment and neglects established principles that govern participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

Ultimately, the disregard for living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently assessed, and the application lacks the necessary foundation for an accurate evaluation of the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment is a serious concern that undermines the evaluation of social impacts, health, and wellbeing related to this development proposal. Although the developer engaged local residents through focus groups, the full report has not been made available, creating a significant evidential gap. This lack of transparency hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Available summaries reveal that local residents are already feeling stress, anxiety, and concern as a result of the proposal's scale and proximity. These effects arise from direct engagement and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the ability to assess their importance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" explicitly noted in the developer's findings. Despite this critical information, the impacts have not been adequately integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they may affect community character and functioning. By failing to provide the full dataset, the application lacks a comprehensive evidential basis for weighing benefits against potential harm.

From a policy perspective, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid harm, yet the evidence available indicates existing 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 considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential criteria of the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed

works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential consequences for marine species and habitats that have already been recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

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

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in assessing the impacts on fisheries and marine life. It lacks a thorough evaluation of ecological and socio-economic consequences, particularly given the diverse marine ecosystem and the active fishing

industry off the West Lewis coast. The application does not adequately demonstrate that these habitats and uses can be protected or maintained without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be displaced without any repercussions. The absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of absorbing additional pressure is a crucial omission. This gap raises serious risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. The lack of a clear, evidence-based assessment means the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to cause disturbances over extensive distances, significantly affecting species such as dolphins. The potential disruption to a large proportion of the local bottlenose dolphin population is a major concern, yet the application diminishes the importance of these impacts without adequate supporting evidence.

There are evident inconsistencies within the application, where the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding adherence to the Habitats Regulations, especially where harm is anticipated to an extent necessitating legal authorisation.

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

From a policy standpoint, the application does not align with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently demonstrate that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity. This absence of compliance prevents any conclusion that the proposal represents sustainable development.

In summary, the overall lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment all contribute to a conclusion that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly neglects to assess the impact of permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting is visible over long distances and would fundamentally alter the night-time environment of the West Lewis coastline, an area characterised by exceptionally dark skies that contribute to its environmental quality, cultural identity, and tourism value. The failure to evaluate these impacts on visual amenity, landscape character, or the experiences of residents and visitors is a major oversight, especially given the growing importance of dark skies to the area's identity and sectors such as astro-tourism.

Furthermore, there is a glaring omission in the assessment of impacts on nocturnal wildlife, particularly species that are sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are at risk of disorientation and increased collision due to phototaxis, yet the application fails to include any lighting impact assessment or phototaxis study, leaving a crucial gap in understanding how aviation lighting may affect these species and increase mortality rates. The reliance on daytime survey data for the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been considered.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites may be adversely affected. The application does not meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecological framework. The absence of any assessment of dark skies and nocturnal wildlife culminates in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The failure to assess the implications of the proposed development on tourism represents a significant oversight, given the economic dependency of the Isle of Lewis on this sector. Tourism has increased notably, with its contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the local economy. The absence of a thorough analysis regarding how large-scale offshore infrastructure might alter visitor numbers and behaviours hinders an accurate understanding of the potential impacts on economic contribution.

Tourism thrives on the area's wild coastline, near-pristine landscapes, and dark skies, all of which provide a unique visitor experience. The application acknowledges that 86% of tourists are attracted by the scenery, yet it does not offer a quantified assessment of how the industrialisation of the seascape could detract from these vital attractions. The lack of consideration for environmental quality, particularly concerning unspoiled landscapes and dark skies, further complicates the evaluation of the tourism sector's potential decline.

Moreover, the failure to incorporate a Dark Skies Assessment leaves a critical gap in understanding the effects on nature-based and astro-tourism, both of which are emerging markets that could significantly benefit the local economy. In an island community where economic diversification is limited, this lack of assessment has broader ramifications for employment, local businesses, and community sustainability.

The submission also falls short in meeting policy requirements, failing to demonstrate adherence to the National Planning Framework 4 regarding economic impacts and the necessity to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Taken collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic vulnerabilities of the island culminate in a significant evidential gap. This situation precludes a thorough evaluation of the economic effects and suggests that the application is 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 echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application is put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for this application is incomplete and unreliable. Significant gaps in baseline data are evident, with the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of crucial impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment lacks completeness, hindering a full understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The failure to produce a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the omission of a full Social Impact

Assessment represents a significant gap. Such deficiencies 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 is in direct violation of National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. It does not confirm that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the lack of tourism impact modelling. There has been insufficient assessment of the cumulative impact of both offshore and onshore components, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory provisions to demand the submission of the missing information.

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

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: B5A56850

Member of the public 1882

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 marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

There is a concerning lack of adequate evidential support for a lawful determination within the application. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and key components of the proposal remain unspecified. The use of a flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of the potential environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects lack robust evidence.

The proposal is marked by clear and substantive conflicts with established policies. It is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. The application does not satisfactorily demonstrate adherence to national requirements for protecting biodiversity, climate considerations, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of this proposal, with large turbines located close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information presented, reliance on undefined mitigation strategies, evident evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and incapable of facilitating a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency, failing to provide a reliable assessment of the likely environmental effects of the proposed development. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This approach compromises the integrity of the assessment, as it does not allow for a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately represent the actual development, which hinders both public understanding and the ability of the competent authority to gauge the true extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured and reasoned comparison of realistic alternatives based on environmental effects, instead presenting a narrative account of project evolution.

This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is no transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline, as well as the critical importance of proximity to shore in determining impact, the failure to conduct such analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings also affect cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, this deficiency impacts 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 material omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not yield a comprehensive or reliable understanding of the ecological receptors present. This region represents a highly sensitive and biologically vibrant marine ecosystem; however, the baseline data provided is insufficient, and the methodologies employed do not adequately capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential basis necessary for evaluating potential impacts.

One notable oversight pertains to otters, classified as a European Protected Species. The application fails to adequately identify and assess their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns indicates that the potential impacts arising from construction

disturbances, noise, and increased human activity have not been thoroughly evaluated. This inadequacy undermines the conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

The limitations of these methodologies lead to the conclusion that claims of negligible or non-significant effects are based on assumptions rather than robust, evidence-based findings. The lack of adequate baseline data further obstructs meaningful assessments of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as there has been insufficient identification and assessment of protected species. The level of uncertainty created precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, the lawful granting of consent is not permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions compromises the reliability of the assessment. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its potential impact on seabird populations, particularly given the west coast of the Isle of Lewis is home to internationally important seabird species that are already experiencing declines. The ornithological assessment submitted with the application is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The key foraging areas and migratory pathways that the development encroaches upon have not been adequately evaluated for implications related to displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, wherein the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the

assessment and suggests that the conclusions presented lack adequate support from the available evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces further uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially due to incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor presents an additional and significant risk by creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term consequences of sustained mortality within this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to provide the evidence necessary to confirm that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means the standard of proving beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to adequately demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal contradictions, methodological weaknesses, and inadequate evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the overarching conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. The developer commissioned this assessment, which included focus groups with local residents, yet the full report remains unpublished. This represents a significant evidential gap that inhibits both public understanding and the competent authority's ability to grasp the full extent of the identified social risks based on the developer’s own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct engagement and are based on tangible experiences, not speculation. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings, limiting the capacity to ascertain their significance within the decision-making process.

Furthermore, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting "cultural loss." Despite this identification, the impacts have not been adequately integrated into the main application nor given appropriate weight. The withholding of the complete Social Impact Assessment obscures the real human and social costs of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be influenced. By failing to provide the full dataset, the application does not offer a complete evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development must facilitate positive health outcomes and mitigate harm, yet existing evidence suggests adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications of this situation are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This gap constitutes a material omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the absence of comprehensive assessment regarding construction and pollution risks. It involves significant seabed preparation and installation activities in a challenging Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be

established after consent, hindering any effective evaluation of their sufficiency or reliability.

This reliance on undefined future measures is particularly alarming given the sensitivity of the West Lewis coastline, which supports clean coastal waters and critical habitats susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer adequate detail on the preventive, control, or monitoring strategies that will be employed.

Furthermore, there is considerable uncertainty concerning the scale and dynamics of sediment plumes generated from seabed disturbances and cable installations. Without robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is further compounded by potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application undermines the ability to determine whether suitable safeguards are in place to address pollution events. This not only introduces procedural risk but also diminishes the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be reviewed prior to consent, and the absence of such critical information obstructs a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts create a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not adequately address the ecological and socio-economic impacts on these vital resources. It lacks a robust evaluation and fails to demonstrate how the fishing activity and habitats can be preserved without significant disruption.

A critical concern is the assumption that fishing can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available or capable of absorbing the additional pressure from displaced activities. This

is a serious oversight, as displacement could lead to overfishing in other areas and adversely affect the local fishing fleet's economic stability. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected over an extended period is likely to disturb marine life across considerable distances, potentially impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without providing sufficient evidence.

There is a notable inconsistency within the application regarding the need for licences for harm to European Protected Species while simultaneously asserting that the impacts are negligible. This contradiction raises significant questions about the credibility of the assessment and compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an exhaustive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be fully understood.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not take into account the full extent of impacts from what is a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. This construction includes excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of

these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application does not allow for a proper evaluation of cumulative effects. Environmental Impact Assessment requires that all parts of a project are considered together, but the distinction between offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

There are also considerable risks to sensitive habitats such as machair systems and peatland environments, which have policy protections. The application does not show that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been taken, creating a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. The application lacks evidence that 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 show protection for peatlands, habitats, and land use interests is inconsistent 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.

Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence on environmental and land use impacts render this part of the application incomplete and unreliable, making a lawful determination impossible.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, creating a continuous and intrusive "wall of light" that would drastically change the night-time atmosphere.

There has been no examination of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This neglect is particularly troubling given the significance of dark skies to the area's identity and the

growth of tourism sectors such as astro-tourism. The failure to evaluate these impacts highlights a clear deficiency in the overall landscape and environmental assessment.

More importantly, the proposal does not consider the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a higher risk of collisions. The application lacks a lighting impact assessment or phototaxis study, meaning it does not address how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or their associated risks. Kittiwakes, for instance, may forage or migrate at night and are equally susceptible to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the preservation of natural areas and environmental quality. It also detracts from the comprehensive evaluation of landscape and seascape effects, as night-time character is a fundamental aspect of the environment.

Overall, the complete lack of 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 inadequate and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts within this application is fundamentally inadequate, neglecting to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and its unique sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Since 2017, tourism has seen remarkable growth, expanding from £65 million to over £81.5 million, while supporting over 1,000 jobs and comprising up to 16% of the island's economy. Despite this progress, the application does not evaluate how the

industrialisation of the seascape and the degradation of environmental quality would affect the Tourism Gross Value Added or broader economic resilience. Without such essential analysis, it remains unclear whether the proposed development would generate a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment overlooks the critical role that environmental quality plays in fostering tourism, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experiences. This gap is further exacerbated by the absence of a Dark Skies Assessment, which hinders understanding of the impacts on an acknowledged and growing segment of the local economy, such as nature-based tourism and astro-tourism.

For an island community that faces limited economic diversification, the failure to thoroughly assess tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Additionally, the lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency hampers a comprehensive evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not offer a comprehensive or reliable evidential basis for assessment.

There are significant deficiencies in the baseline data, the use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, it omits crucial impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a full understanding of the likely

significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. These failures hinder the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct opposition to National Planning Framework 4, the proposal does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as it does not include tourism impact modelling. Furthermore, the cumulative effects of 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. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy conflicts and unresolved environmental risks, prohibits a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 89206E90

Member of the public 1883

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough evaluation of the Environmental Impact Assessment Report and accompanying documentation, which reveal significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely unspoiled environment, and strong cultural heritage. The dimensions, proximity, and overall design of the project raise essential concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful assessment. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The flexible design framework employed inhibits a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a complete or informed assessment of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Substantive conflicts with existing policy are evident. 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 public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

The scale of the project is without precedent in this region, with large turbines proposed in very close proximity to the shoreline. This raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental consequences. In summary, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies illustrate that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential details, failing to deliver a transparent or comprehensive overview of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the assessment introduces considerable uncertainty. This compromises the integrity of the evaluation, making it impossible for both the public and the competent authority to grasp the true nature of environmental effects, as the impacts reported may not accurately reflect what will ultimately be constructed.

The application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been clearly defined. Seeking consent based on the premise that environmental harm will be addressed in the future undermines any genuine evaluation of effectiveness or analysis of residual impacts. Deferring critical information until after consent is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be established prior to the determination process.

Significant evidential shortcomings exist within the application, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are drawn without substantial supporting data. The lack of adequate information impedes a clear understanding of cumulative and worst-case impacts, and introduces scientific uncertainties that do not meet statutory requirements.

Consequently, the application fails to fulfil the evidential requirements stipulated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is critically flawed and does not adequately reflect the ecological conditions of the West Lewis coastal environment. This area is recognised as a highly

sensitive and biologically diverse marine ecosystem, yet the available baseline data remains incomplete. The methodologies employed in the assessment do not successfully capture vital information regarding the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment fails to provide a reliable evidential foundation for determining potential impacts.

Among the significant omissions is the treatment of otters, classified as a European Protected Species. The application does not sufficiently acknowledge their active foraging and movement patterns within coastal areas. The oversight regarding their core foraging range and behaviour means that the likely consequences of construction-related disturbances, noise, and increased activity are not adequately addressed. This lack of thorough assessment raises doubts about the validity of conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise in the evaluation of basking sharks, particularly due to the reliance on aerial surveys which introduce substantial detection bias, particularly under Atlantic weather conditions. This method is prone to underestimating the presence of these sharks, especially when compared to established land-based observations that demonstrate their regular usage of these waters. The failure to integrate or appropriately consider such observations leads to an incomplete baseline, undermining the reliability of the conclusions drawn.

These methodological shortcomings result in assessments of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data inhibits a meaningful appraisal of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the actual risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The resulting uncertainty prevents the dismissal of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these circumstances, the granting of consent cannot be justified under the law.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These limitations obstruct a thorough evaluation of potential impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sound evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. However, the ornithological assessment associated with the development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to meet

the required evidential standard necessary to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A major contradiction arises within the application itself, as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It inadequately considers the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially due to incomplete baseline data and an incomplete understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor presents a significant risk by creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not thoroughly 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 meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in the modelling, means 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.

The identified deficiencies also indicate non-compliance 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 face adverse effects 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. These shortcomings hinder a robust evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements essential for determination.

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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer’s Social Impact Assessment lacks transparency, as the full report has not been published, creating a significant evidential gap. This omission prevents both

the public and the competent authority from fully understanding the social risks highlighted by 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 should not be considered speculative. However, the lack of access to the complete assessment limits scrutiny of these findings, hindering the assessment of their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with cultural loss identified as a concern in the developer's findings. Despite this acknowledgment, these impacts have not been adequately integrated into the main application or given the necessary consideration. The non-disclosure of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely impacts the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is crucial for developments of this scale, particularly when community character and functionality may be at risk. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis for weighing benefits against potential harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the lack of access to the full Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, in conjunction with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This prevents a lawful determination and strengthens the assertion that the application lacks sufficient information to proceed.

CONSTRUCTION AND POLLUTION RISKS

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

effectiveness beforehand.

This reliance on unspecified future measures is particularly alarming, considering the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate details on how these risks will be prevented, managed, or monitored.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's separation of offshore turbines and onshore works results in a materially incomplete assessment, failing to fully account for the integrated nature of the project. This fragmented approach obscures the true scale of the environmental and socio-economic impacts, as the onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are not adequately assessed alongside their offshore counterparts.

Significant concerns arise from the construction activities, particularly the excavation across areas of deep peat within Barvas Moor. This region is a crucial carbon store and

ecologically sensitive habitat, yet the application lacks a comprehensive evaluation of these impacts. Consequently, it prevents an accurate understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, and the current separation hampers a complete understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, face significant risks that are not fully addressed. The application does not adequately demonstrate that impacts on these protected areas have been assessed or that suitable avoidance measures have been implemented, which highlights a clear evidential gap regarding biodiversity protection.

Furthermore, the disturbance of peatland raises serious concerns about the carbon balance. Disturbing these areas releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application provides insufficient detail on this matter or assurance that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land presents additional challenges, introducing potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, thereby raising questions about the deliverability and lawful implementation of the project.

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 inability to show that impacts can be avoided or mitigated further weakens the application.

In summary, the division of project components, the lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in an incomplete and unreliable application, hindering lawful determination.

TOURISM

The proposal lacks a thorough assessment of tourism impacts, which is critical given its significance to the Isle of Lewis economy. Tourism relies heavily on the area’s wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the economic contribution of the sector.

In recent years, tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application does not explore how the potential industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the resilience of the local economy. Without such analysis, it is impossible to ascertain whether this development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in attracting tourists, specifically the role of unspoiled landscapes and dark skies in enhancing visitor experiences and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the implications for a recognised and growing component of the local economy.

Given that the island community has limited economic diversification, the neglect to assess tourism impacts extends beyond this sector, affecting employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in line with the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to appraise the economic ramifications of the proposal.

The collective failure to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and address the island's economic reliance results in a significant evidential gap. This situation hampers a comprehensive evaluation of economic effects and reinforces the notion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as evaluated against statutory duties, national policy, and evidential standards. It replicates the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under an enhanced policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A complete and reliable evidential basis for the proposal is lacking. There are significant gaps in baseline data, an undefined design envelope continues to be employed, and there is reliance on unspecified mitigation measures. Additionally, key impact

pathways, including nocturnal wildlife, full onshore infrastructure, and effects on tourism, have not been included. Consequently, the Environmental Impact Assessment remains incomplete, preventing a thorough understanding of likely significant effects or residual impacts.

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

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

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the applicable regulatory provisions to mandate the submission of the outstanding information.

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

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: 9CAA10B5

Member of the public 1884

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and highly sensitive, yet the

methodologies applied do not adequately capture crucial details regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

Among the significant gaps is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal zones for foraging and movement. By failing to assess their core foraging range and behavioural patterns, the potential effects of construction-related disturbances, noise, and increased activity remain unexamined. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Moreover, the evaluation of basking sharks reveals further shortcomings. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic weather conditions, likely leading to an underestimation of their presence. This is in stark contrast to established land-based observations, which indicate that these waters are frequently utilised by the species. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline, which in turn diminishes the reliability of the conclusions drawn.

The methodological limitations present in the assessment result in conclusions regarding negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including those associated with seasonal variations and interactions within the wider ecosystem. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty precludes the ability to dismiss adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is evident that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, featuring significant internal inconsistencies and substantial gaps in evidence that undermine its conclusions. It fails to adequately demonstrate that internationally important seabird populations, many of which are already in decline, will not be adversely affected by the proposed development on the west coast of the Isle of Lewis. This area includes key foraging zones and migratory pathways, yet the assessment does not properly evaluate the risks

associated with displacement, collision, or habitat loss.

A critical contradiction exists within the application; while the developer asserts that there will be no significant adverse effects, they also pursue a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. Such inconsistencies raise serious doubts about the credibility of the assessment and suggest that its conclusions lack the necessary supporting evidence.

The evidence presented is insufficient to assure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species that are experiencing severe decline, like Kittiwakes and Fulmars. Methodologies used in the assessment are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and substantial risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations.

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

These deficiencies also constitute a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's weaknesses in methodology, evidence, and internal consistency lead to the conclusion that it does not fulfill the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, represents a major shortcoming in the assessment. These sites serve as active places for burial and spiritual practice; however, they have been categorised merely as static features. This oversight fails to acknowledge their ongoing use and significance, as well as the potential impact of development on their setting. Such a mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance within community life.

Furthermore, the assessment overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are vital to the area's identity and have been wholly disregarded, marking a significant omission. The lack of consideration for these factors means the cultural impact of the proposed development cannot be fully comprehended.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses distinct characteristics of an Indigenous People, has not been granted the opportunity for Free, Prior and Informed Consent. The absence of this meaningful engagement diminishes the credibility of the assessment and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, which is mandated 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 is significant enough to prevent a lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to take into account both tangible and intangible heritage, and to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not present a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified by the developer.

Summaries suggest that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct community engagement, not speculation. However, without access to the complete assessment, proper scrutiny of the findings is not possible, which limits the assessment of their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and

cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the impacts have not been adequately included in the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be affected. By not providing the complete dataset, the application lacks a solid evidential basis to weigh the benefits against potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet existing adverse effects indicated by available evidence have not been fully disclosed. Consequently, without the full assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This hinders a lawful determination and underlines the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant shortcomings in the assessment of seascape, landscape, and visual impacts. This coastline, characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness, would face fundamental alterations due to the introduction of an industrial presence in close proximity to the shoreline. Such a transformation is not only significant but also permanent and irreversible, fundamentally changing the landscape character.

The application inadequately portrays the extent of visual change, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and compromise the essential qualities of naturalness and remoteness that define the area. The current assessment fails to capture the severity of this impact or its importance within the context of such a sensitive landscape.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that these viewpoints may not adequately reflect the most

sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises concerns that the assessment may have understated the magnitude of visual impacts, thereby questioning the reliability of the findings.

Moreover, the assessment does not consider the interconnected nature of landscape, seascape, and cultural heritage. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded within a broader landscape context that relies on visual and spatial links to the Atlantic horizon. By treating these assets as separate entities, the assessment overlooks their interdependence, leading to an incomplete analysis 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 perceived and severing their relationship with the natural horizon. This results not only in a visual impact but also in broader cultural and spatial harm, which the application has not sufficiently evaluated.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of the proposed changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claims of compliance with policy requirements.

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. As such, the anticipated changes represent a fundamental and permanent alteration that cannot be lessened 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 shortcomings hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the protection of this unique landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient, lacking the necessary detail to properly evaluate the likely environmental effects. The proposed works involve significant seabed preparation and installation activities within a dynamic Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that would be developed after consent, which obstructs any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures is particularly alarming due to the

sensitivity of the environment in question. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbances caused by sediment and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to potential consequences for marine species and habitats that have already been recognised as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place for responding to pollution events. This creates procedural risks and hampers the competent authority's ability to assess environmental protection measures prior to determination.

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

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of sustaining additional pressure. This significant omission raises the risk of overfishing in other areas and could have broader

economic consequences for the local fishing fleet. Without a comprehensive and evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain unclear.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application 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.

TOURISM

The economic contribution of tourism on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite this impressive increase, the application under consideration fails to provide a comprehensive evaluation of how proposed large-scale offshore infrastructure would impact tourism, particularly in terms of visitor numbers and behaviour, as well as the overall economic contribution. This deficiency raises questions about whether the development would provide a net economic benefit or detract from a vital and expanding sector.

Tourism heavily relies on the island's natural attributes, including its wild coastline, near-pristine landscape, dark skies, and a sense of remoteness, with 86% of visitors reportedly attracted by the scenery. The assessment neglects to account for the vital role that environmental quality plays in supporting tourism, especially the significance of unspoiled landscapes and dark skies in enhancing visitor experiences. This oversight is further highlighted by the absence of a Dark Skies Assessment, creating a substantial gap in understanding the impact on a growing segment of the local economy, namely nature-based tourism and astro-tourism.

Given the island community's limited economic diversification, the failure to adequately assess the impacts on tourism poses broader implications for local employment, businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been properly evaluated, as mandated by the Islands (Scotland) Act 2018. Furthermore, from a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impacts and the necessity to illustrate a net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide sufficient evidence for competent authorities to gauge the economic consequences of the proposal.

Overall, the gaps in the assessment of tourism impacts, environmental factors influencing visitor behaviour, and the island's economic dependency culminate in a significant evidential shortfall. This inadequacy hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

There are notable procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a

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

The proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been properly evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

Additional Comments

Yet another quasi green project that will ravage our beautiful land. There is no generation of electricity that doesn’t require a BESS, taking up ugly acres of land and causing fire risk in areas with only retained firefighters. They also need giant pylons to take the product south, as the population is too low for the electricity to be used where it is generated. All these will blight our lives and landscape while damaging natural flora and fauna and releasing CO2 into the atmosphere.
Please, just stop this white elephant project.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9CD86916

Member of the public 1885

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which fundamentally challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient transparency and reliability in conveying the anticipated environmental consequences of the proposal.

The implementation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment, leading to potential discrepancies between the projected impacts and the actual development, thereby hindering both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

Furthermore, the application is predominantly contingent on mitigation measures, monitoring strategies, and management plans that are not yet established. As a result, consent is requested based on the expectation that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of these measures' effectiveness or a comprehensive assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly defined before determination.

There are notable evidential shortcomings, such as gaps in baseline data, limitations in methodology, and the reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a thorough understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

Consequently, the application does not meet the evidential standards stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes directives related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been comprehensively assessed or that suitable safeguards are in place.

In conclusion, the dependency on an undefined design envelope, the lack of specified mitigation measures, and the inadequacies in baseline data all contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental impacts, leaving the competent authority ill-equipped to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives is severely lacking and does not fulfil the statutory requirements of the Environmental Impact Assessment regime. The application presents a narrative account of project evolution instead of a structured, reasoned comparison of realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging

solutions is concerning.

There is a significant lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the developer has not demonstrated that they have seriously considered the option of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in assessing impact, the lack of such an analysis prevents any determination that the proposed siting is the least damaging option.

The inadequacies extend to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, with undue reliance on post-design mitigation measures instead.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a clear failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to assess 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 policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally flawed and fails to offer a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area represents a biologically active and sensitive marine system, yet it is clear that the baseline data is insufficient. The methodologies employed do not effectively capture species presence, behaviour, or habitat utilisation. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight is evident in the evaluation of otters, which are a European Protected Species. The application does not adequately recognise or assess their usage of coastal areas for foraging and movement. This gap in the assessment neglects their core foraging range and behavioural patterns, which means that the potential effects of construction disturbance, noise, and increased activity have not been

sufficiently examined. This omission undermines any claims regarding the absence of significant effects on the otter population.

Additionally, the assessment of basking sharks suffers from deficiencies, particularly due to reliance on aerial surveys, which can create considerable detection bias under Atlantic conditions. This reliance is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that demonstrate frequent usage of these waters. The failure to include or adequately consider such pertinent data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological shortcomings imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, which includes considerations of seasonal variation and broader ecosystem interactions. Such limitations create significant uncertainty regarding the actual scale of risk 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, given that protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies obstructs the ability to conclusively rule out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, reinforcing the assertion that the application is devoid of a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on local wildlife, particularly on the internationally important seabird populations along the west coast of the Isle of Lewis. These populations, many of which are already in decline, are critical to the area's biodiversity. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The site is situated within vital foraging areas and migratory pathways, yet the assessment provided does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There exists a critical contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also putting forth a case for Habitats Regulations derogation, which is typically invoked in situations where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not backed by sufficient

evidence. Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of their feeding grounds is insufficiently addressed, and reliance on modelling methodologies introduces uncertainty, particularly concerning species that are already in severe decline, like Kittiwakes and Fulmars.

The proposed siting of turbines within a recognised migratory corridor adds another layer of risk, potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not effectively evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

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

The deficiencies noted also signify non-compliance with the National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that the development will not adversely impact internationally important seabird populations places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, particularly in its treatment of the West Lewis coastline, which should be viewed as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a simplified perspective, treating cultural heritage as a collection of isolated, static assets. This approach neglects the active social, cultural, and spiritual roles these sites play within the community.

Significant deficiencies arise in the assessment of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice. However, they are mischaracterised as static features, with the assessment failing to account for their ongoing use and significance, as well as the potential impacts of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural consequences and ignores their integral role in community life.

The assessment also neglects intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment. These elements are vital to the area's identity yet are omitted from the assessment, creating a considerable oversight. Without acknowledging these aspects, it is impossible to truly grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement are also apparent. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of an Indigenous People. However, the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement undermines the credibility of the assessment and disregards established principles regarding participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure. This assessment is mandated under the Islands (Scotland) Act 2018, and without it, the competent authority is unable to meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone makes it impossible to proceed lawfully with the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The failure to adequately address both tangible and intangible heritage, alongside the need to acknowledge living cultural practices, represents a clear deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as a result, the application falls short of providing a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been made public. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from understanding the full extent of social risks identified by the developer's own research. Available summaries suggest that residents are already feeling stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation. However, without access to the complete assessment, proper scrutiny of these findings is not possible, which limits the ability to evaluate their significance in the decision-making process.

There is evidence that the proposal is seen as a threat to community identity and

cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, these impacts have not been adequately considered in the main application. The withholding of the full Social Impact Assessment conceals the true human and social costs of the development. This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at risk. Without the complete dataset, the application does not provide a comprehensive basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and avoid harm, yet the available evidence points to existing negative effects that remain undisclosed. Without the full assessment, it cannot be established that the application meets this policy.

The implications of these procedural issues are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime. In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This ultimately prevents a lawful determination and confirms that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

In summary, the assessment fails to accurately represent the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings preclude a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for substantial seabed preparation and installation works within this high-energy Atlantic environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally,

there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

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.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant concern. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in sectors like astro-tourism. The proposed installation of permanent red aviation lighting, visible across long distances, would create an intrusive “wall of light” effect that fundamentally alters the night-time environment.

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

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

site-specific night-time data presents a critical gap in understanding the ecological implications of the proposal.

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

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

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

TOURISM

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

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

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

In an island community with limited economic diversification, neglecting the impacts on tourism carries wider implications for employment, local businesses, and

community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a failure to meet the standards of sustainable development. This proposal does not address the statutory duties, national policy, or evidential standards required. It echoes the issues from the 2008 refusal of the Lewis Wind Power proposal, as the industrial scale remains unacceptable. Although the current application falls under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still lacks necessary support.

Significant gaps in baseline data are evident, alongside the use of an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways are omitted. This includes nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are present as well. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal conflicts with National Planning Framework 4. It does not sufficiently protect biodiversity, natural places, or cultural heritage. There is a lack of evidence showing that health and wellbeing impacts are acceptable, and it fails to demonstrate a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts from offshore and onshore components have not been accurately assessed, leaving the effects on peatlands, carbon balance, habitats, and crofting land unclear.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to rule out adverse effects has not been achieved, invoking the precautionary principle and hindering lawful conclusions regarding acceptable impacts.

The proposal will 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 effects on tourism represent permanent changes that cannot be mitigated adequately.

Considering these issues, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks prevents a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or exercise regulatory provisions to demand 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: 1BFBE391